

Representation - Draft Modification Report UNC 0570

Obligation on Shippers to provide at least one valid meter reading per meter point into settlement once per annum

Responses invited by: **5pm 10 August 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Robert Cameron-Higgs
Organisation:	Flow Energy
Date of Representation:	10 August 2017
Support or oppose implementation?	Qualified Support
Relevant Objective:	d) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

Flow Energy offer qualified support for this proposal. We fully endorse the intent and rationale of the proposal which will provide increased settlement accuracy through increased meter read submissions.

Our slight caution in offering full support is the apparent disparity in the legal text between the suppliers licence (SLC21B.4) and the proposed TPD text in (new) paragraph M 5.9.9. We are unsure whether the CMA view endorsed this view to make this new UNC requirement a higher threshold

SLC 21 B.4 requires the licensee to take all reasonable steps to obtain a meter reading, whereas M5.9.9 states that Users must secure at least one Valid Meter Reading in every 12 month period.

There will be instances where a read cannot be secured in this 12 month period (e.g. long term vacant, empty properties etc). Such instances require different attention and on occasions multiple attempts to gain access to procure a read and as such it is highly probable that these specific instances will fail the proposed 'must secure' rule.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

We are satisfied that implementation can occur immediately post implementation

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

Taking the proposed text at face value, the potential for significant increased operational costs exists if the intent is that shippers **must** procure valid reads for all eligible sites in the prescribed 12 month timeframe.

Legal Text: *Include details of any impacts/costs to your organisation that are directly related to this.*

See previous comments

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

Linked to our earlier points, clarification is sought on the expectation for all eligible sites to be read, and if not, what the acknowledged position is for those which cannot be read despite the endeavours of the shipper.

Please provide below any additional analysis or information to support your representation