

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:	Angela Love
Organisation:	ScottishPower Energy Management Limited
Date of Representation:	10 th August 2017
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

As set out within the proposal, ScottishPower believes that there would be a benefit to the accuracy of the gas settlement arrangements if there is a requirement for Shippers to submit a meter reading once per annum for all supply points. In particular the proposal should ensure that there is much less likelihood for the “line in the sand” date to arrive and for there to be insufficient meter readings for sites to be reconciled before close out.

In the intervening period since this MOD was raised, in February 2016, the CMA Gas Settlement Order introduced this requirement into the Gas Supply Licence. This modification therefore is really just formalising the Licence Condition obligation in the Uniform Network Code, requiring a reading to be provided at least once per annum.

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

ScottishPower does not believe that there is a lead-time needed for this proposal, as it is already a Supply Licence requirement.

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

ScottishPower does not believe that there are additional costs from this proposal.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

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.*

No.

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

N/A