

Representation - Modification UNC 0722 (Urgent)

Allow Users to submit Estimated Meter Reading during COVID-19

Responses invited by: **1pm on 27 April 2020**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Claire Roberts
Organisation:	ScottishPower
Date of Representation:	27 th April 2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

ScottishPower support this modification allowing users to submit estimated meter readings as actuals for Non Daily Metered sites. However, we would seek clarity on a number of points:

- Clarification on how the estimated reading should be calculated – Will there be a defined criteria/calculation.
- Confirmation of how the estimated readings will be identified - is this going to be a set condition/marker?
- Is there going to be an allowance for the customer to supply an estimated reading.
- Reconciliation post Covid-19 - Which read would be used for reconciliation following Covid-19?
E.g. If there was an actual read for March 2020, then an estimated read for May 2020 and then an actual read is received in July 2020, which reads would be used for reconciliation March and July or May and July?

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

As directed by Ofgem.

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

None Identified

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.*

Is there an IGT UNC impact?

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

N/A