

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:	David Morley
Organisation:	OVO Energy
Date of Representation:	27/04/2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

Due to unavailability of meter readers, customers being unable to obtain meter readings, restricted access to premises, and limited opportunity to take corrective measures with respect to faulty meters, read performance will be at detriment, sites will not be reconciled for a considerable period and AQs will not be created. On this basis enabling the submission of estimates for Non-Daily Metered Supply Meter Points during the COVID-19 pandemic will enable these processes to continue.

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

As soon as reasonably practicable after approval.

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

N/a

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.*

It would be beneficial to understand what the impact of this would be on read performance metrics. For example, clarification should be provided on whether an

estimated read submitted for an annually read small supply point contributes to hitting the 70% target for the shippers portfolio.

We would also expect a mechanism to be in place to monitor suppliers' use of estimates submitted with regards to 0722, and a process to reconcile those submissions and update historically once an actual read is obtained by CDSP. We believe that the process put in place by 0722 should be used with caution as it could be open to abuse.

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

N/a