

Mr. Julian Majdanski  
Joint Office of Gas Transporters  
First Floor South  
31 Homer Road  
Solihull  
West Midlands  
B91 3LT

Your ref  
Our ref  
Name Chris Hill  
Phone 01905 340589  
Fax  
E-Mail christian.hill@rwenpower.com

June 6, 2008

**Re: Proposed UNC Modification 0202 – “Improvement to More Frequent Reading Provisions to Allow Benefits of AMR”**

Dear Julian,

RWE Npower offers qualified support for the above Proposed UNC Modification.


We are in agreement with the principle that a User should be able to elect an SSP to be Monthly Read as long as such a site has AMR installed and operational. This will then allow the SSP in question to submit monthly or even weekly readings, which should improve the AQ accuracy of sites such as these.

However, we are uncertain as to whether the arrangements and market relating to AMR are at present in a sufficiently developed state for Users to derive the full benefit from the Proposed Mod and would also like to raise some points relating to this.

As stated in the Draft Modification Report, concerns have been raised over the current ability of Xoserve to deal with the potentially large increase in meter reads that the Proposed Mod would be likely to result in if implemented. If the UK Link system were unable to cope with this increased volume of information then the impact on the working of the system could potentially be very serious. As it has been indicated that there may be an opportunity during the scheduled UK Link rebuild in 2012 to accommodate this increased flow, it may be that it would be more appropriate to make this part of the rebuild then, should the Proposed Mod be implemented, rather than take the risk now that UK Link might struggle with the extra data flow.

It is also worth noting that “AMR” meters have never been properly defined, i.e. there is no universally agreed criteria for this particular type of meter. For the avoidance of any confusion in relation to this, and particularly in relation to interoperability of such meters in future it would be much appreciated if some guidance could be provided by Ofgem on this matter. Following on from this, we would like to state our view that I&C and Domestic meters should be kept separate and should not necessarily be required to conform to the same design and operation specifications.

However, we are willing to lend our support to the Proposed Mod in light of the fact that it merely gives Users the option to go down this route at the present time should they wish to do so.

  
Oak House  
Bridgwater Road  
Worcester WR4 9FP  
T +44 (0)1905/34 05 21  
F +44 (0)1905/34 04 88  
I www.npower.com

Registered office:  
Npower Limited  
Windmill Hill Business  
Park  
Whitehill Way  
Swindon  
Wiltshire SN5 6PB

Registered in England  
and Wales no. 3653277

If you wish to discuss any points raised in this response further, please do not hesitate to contact me.

Regards,

Chris Hill

Gas Codes Analyst