



Julian Majdanski
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Dear Julian

Re: UNC Modification Proposal 0202: Improvement to More Frequent Reading Provisions to Allow Benefits of AMR

Shell Gas Direct (SGD) Ltd, the holder of both gas supplier (non-domestic) and shipper licences, offers the following brief comments in response to the above proposal. For the avoidance of doubt, SGD is in favour of implementation.

In brief, SGD considers that this proposal to allow monthly meter reads for Small Supply Points would have a number of benefits, namely:

- an improvement in transportation and energy billing accuracy;
- more accurate and frequent targeting of costs between market participants; and
- reducing the extent of future RbD reconciliation processes;

Additionally, through implementation of this proposal, the availability of more frequent meter reads should, at least partially, help improve AQ accuracy. Moreover, SGD would imagine that more accurate and timely information would be of benefit to network owners with regards to system development and operation.

Clearly, XOSERVE may eventually face an increase in the volume of data it is required to process. However, this potential concern would surely depend on the initial take-up rate of more frequent meter reads? Unless there is robust ex-ante evidence to suggest that this rate would be prohibitively high, market participants should not be stopped from utilising the benefits of AMR as summarised above.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Amrik Bal', is located below the 'Yours sincerely' text.

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