

John Bradley
UNC Panel Secretary
31 Homer Road
Solihull
West Midlands
B91 3LT



08 October 2009

Dear John

EDF Energy Response to UNC Modification Proposals 0258 & 0258A: “Facilitating the Use of Remote Meter Reading Equipment for the Purposes of Demand Estimation Forecast Techniques”.

EDF Energy welcomes the opportunity to respond to the UNC Modification Proposal. We support implementation of Modification Proposals 0258 & 0258A. We prefer implementation of proposal 0258A.

Both proposals 0258 and 0258A seek to address an apparent deficiency within the UNC by enabling the use of Remote Meter Reading equipment when collecting the statistical data required to support the development of End User categories (EUCs) and Demand Models used in the Demand Estimation process. It would appear that enabling the Transporters to use the technology that is currently available is un-contentious. We have been given assurances from the Transporters that this amendment will have no associated impact on the operation or management of the gas systems. It would appear that it is far more efficient and economic to allow meter readings to be accessed remotely rather than require attendance and inspection at each individual data logger.

However we would note that both proposals suggest that utilising remote meter reading equipment should improve data quality over data loggers as the Gas Transporters would become aware of any faults occurring in the equipment or if the equipment had been disconnected at a much earlier stage. However EDF Energy would question whether this would be achieved? In particular we would note that Remote Meter reading equipment does not send daily reads, but rather requires the reads to be “collected” from the device. It would therefore appear that the equipment could malfunction or be disconnected and the Gas Transporters would only become aware of this when the reads were “collected”. It would therefore appear that the stated benefits from data quality have been overstated.

EDF Energy prefers implementation of UNC Modification Proposal 0258A as it has the same effects as 0258, but also enables the Transporters to procure the data from a third party rather than having to collect the data and install devices themselves. Given the Government’s mandate regarding the roll out of AMR and Smart Metering it would appear likely that there will be numerous parties, including Shippers and Suppliers, who will hold daily information. It would therefore appear inefficient and uneconomic to require the Transporters to install duplicate meters and collect data that is already held by third parties.

However whilst we support both proposals, we believe that the Transporters will need to address certain issues if either modification proposal were to be implemented. Whilst strictly outside of the scope of the proposals we believe that the Gas Transporters will have to:

- Work with the Demand Estimation Sub-Committee to identify whether consumers with AMR or Smart meters installed will have the same demand patterns as traditionally metered consumers. This may require the creation of additional or new EUC bands.
- Work with Shippers, Suppliers and end consumers to identify whether the readings collected from a Gas Transporter installed Remote Meter Reading equipment can be utilised, or made available for the consumer.
- Where the data has been procured from a 3rd party, work will need to be undertaken to ensure that the data is statistically relevant and accurate.
- Where the Gas Transporter has installed Remote Meter Reading equipment, how will this be flagged to the Gas Shipper, Supplier and MAM? In particular we would note that this information needs to be available to avoid confusion in the roll out and installation of AMR and Smart Meters and to ensure that the Remote Meter Reading equipment is not disconnected or removed.

I hope you find these comments useful, however please contact my colleague Stefan Leedham (Stefan.leedham@edfenergy.com, 020 3126 2312) should you wish to discuss these in further detail.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Seb Eyre'.

Dr. Sebastian Eyre
Energy Regulation, Energy Branch