

## Representation

### Draft Modification Report

#### 0362 - Use of 'notional Meter Readings' and 'Agreed Opening Meter Readings' for Individual CSEP Reconciliation

**Consultation close out date:** 19 May 2011  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** E.ON UK  
**Representative:** Brian Durber  
**Date of Representation:** 18 May 2011

#### Do you support or oppose implementation?

Support

#### Please summarise (in one paragraph) the key reason(s) for your support/opposition.

Implementation will overcome an existing undesirable situation whereby large volumes of energy associated with NDM larger supply points connected via CSEPs remain un-reconciled. The use of notional reads and agreed transfer reads will facilitate this reconciliation. This is in line with similar supply points directly connected to the GDN.

#### Are there any new or additional issues that you believe should be recorded in the Modification Report?

#### Self Governance Statement:

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

Yes

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

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Representation

26 April 2011

Version 1.0

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Standard Special Condition A11.1 (d):

Implementation allowing a greater quantity of individual CSEP reconciliation would reduce risk placed on shippers by ensuring predictable and appropriate energy allocation. This would be in support of competition between shippers.

**Impacts and Costs:**

*What analysis, development and ongoing costs would you face if this modification were implemented?*

None identified

**Implementation:**

*What lead-time would you wish to see prior to this modification being implemented, and why?*

In line with prescribed process for self governance.

**Legal Text:**

*Are you satisfied that the legal text will deliver the intent of the modification?*

Yes

**Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*