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26th August 2011

Your Reference:UNC Modification Proposal 0386

Re: UNC Modification Proposal 0386: Extending rights to Protected Information provisions for
Meter Asset Managers / Registered Metering Applicants

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Uniform Network Code (UNC) Modification Proposal for which National Grid Gas Distribution (NGD) would like to offer support.

Do you support or oppose implementation?

Support/~~Qualified Support/Neutral/Not in Support/Comments*~~ *delete as appropriate*

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

Presently the UNC permits the provision of the supplier identity and relevant Meter Information to the Registered Metering Applicant (RMA). The RMA is defined within TPD Section V5.11 as being the person who is registered to request and receive Supply Meter Point Information from the Transporter on behalf of the Registered User.

The 'protected information' provisions contained within V5.11 do not permit the release of data to a RMA which constitutes a Meter Asset Manager (MAM) where the MAM identity is not populated on the Supply Point Register.

It has been identified that approximately 263,000 Supply Meter Points do not have a MAM identity recorded against them. In these circumstances, we understand significant difficulty is experienced by MAMs with some organisations resorting to contacting all suppliers to try to identify the relevant supplier. This is clearly an unsatisfactory situation which can be simply remedied by modifying the UNC to permit large Transporters to release the supplier identity, meter serial number and meter model to a valid MAM where the enquiring MAM provides a Meter Point Reference Number (MPRN) to which there is no MAM registered on the Supply Point Register.

We believe the following change benefits would be forthcoming as a consequence of implementation of this Modification Proposal:

- MAMs would be able to identify the supplier to a Supply Meter and establish relevant arrangements.
- There is a potential for improved quality of data contained on the Supply Point Register which could facilitate subsequent processes e.g. change of supplier events.

We are advised by Xoserve that from an operational perspective to receive the service the MAM would be validated and must provide the relevant MPRN/s. MAMs would not be permitted to request a portfolio of 'blank' MPRNs. We also understand that where the MAM identity is populated the enquiring MAM would be advised that another MAM is registered to the MPRN; consequently the registered MAM identity would not be released.

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

We have not identified any such issues.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Standard Special Condition A11.1 (d): so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers.

The purpose of this Modification Proposal is to provide for the release of relevant Meter Information and the Supplier Identity to MAMs where the MAM id has not been populated on the central systems. We believe this measure facilitates the above relevant objective.

Impacts and Costs:

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

NGD does not envisage that costs would be incurred as a consequence of implementation of this Modification Proposal.

Implementation:

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

This Modification Proposal could be implemented with immediate effect.

Legal Text:

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

NGD has provided legal text with respect to this Modification Proposal. We have consulted with the Proposer and are satisfied that the text as published by the Joint Office within the Draft Modification Report meets the requirements of the Modification Proposal.

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

NGD has not identified any such matter.

We trust that this information will assist in the compilation of the Final Modification Report.

Please contact me on 01926 653541 (chris.warner@uk.ngrid.com) should you require any further information

Yours sincerely,

Chris Warner
Network Code Manager, Distribution.