

Representation

Draft Modification Report

0430: Inclusion of data items relevant to smart metering into existing industry systems

Consultation close out date: 07 February 2013

Respond to: enquiries@gasgovernance.co.uk

Organisation: SSE

Representative: Anne Jackson

Date of Representation: 7 February 2013

Do you support or oppose implementation?

Support

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

SSE is supportive of this modification as this mod enables transporters to collect and pass data to the licenced Data Communications Company (DCC), thereby facilitating the rollout of smart metering.

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

None

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We believe that implementation would further facilitate the relevant objectives A11.1 (d) and (f):

A11.1 (d) Securing of effective competition between relevant suppliers by enabling suppliers to have access to smart data, which will allow them to efficiently effect the change of supplier process.

A11.1 (f) Promotion of efficiency in the implementation and administration of the Code by amending central systems once to enable the support of both the foundation and enduring solutions for smart meter roll-out.

Impacts and Costs:

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

We note the indicative costs and would prefer the costs to be allocated to shippers based on their small meter points (<11 cu m per hour in size).

Implementation:

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

SSE would like to see these changes implemented no earlier than the beginning of mass roll-out for smart meters scheduled for quarter 1, 2014. We recognise that the implementation date is to be designated by Ofgem as indicated in the legal text.

Legal Text:

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

SSE note that the legal text 'suggests' that shippers should provide the relevant data items within 4 Days. This conflicts with other UNC obligations, for example to provide Meter Information (within which the meter mechanism is included) within 6 Business Days.

For the roll-out of Smart metering, the timescales for passing meter information and these relevant smart data items to the transporter may need to be altered, but this needs to be fully considered along with the implications to systems and service providers.

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.

None