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Your Reference:UNC Modification Proposal 0455S

UNC Modification Proposal 0455S - Updating of Meter Information by the Transporter

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal for which National Grid Gas Distribution (NGD) as Proposer would like to support.

Do you support or oppose implementation?

Support

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

There are circumstances where Shippers may not update the Supply Point Register where they have been advised of erroneous Meter Information ('meter asset' data) by the Transporter. There is presently no mechanism under the UNC where the Transporter can assume this role in the event that the Shipper does not update the data. This Modification Proposal identifies a remedy to this anomaly and therefore it is our opinion that implementation would significantly improve the quality of data recorded on the Supply Point Register.

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

We have not identified any such issues.

Self Governance Statement:

We agree that this Modification Proposal should be subject to self-governance procedures.

Relevant Objectives:

Standard Special Condition A11.1 (d): Securing of effective competition between relevant Shippers and relevant Suppliers.

NGD raised this Modification Proposal as a proactive measure to facilitate and maintain timely and accurate Meter Information recorded on the Supply Point Register. Poor quality 'meter asset' data

has a significant and detrimental financial impact on Shippers. The absence of good quality data results in deterioration in the timely calculation of transportation and energy invoices leading to inaccuracies being borne financially by the shipping community through the Reconciliation by Difference (RbD) and Allocation of Unidentified Gas (AUGE) mechanisms.

We concur with the statement set out in the Draft Modification Report that implementation would potentially cause fewer billing related problems for User, Suppliers and consumers, particularly those who are changing supplier.

Impacts and Costs:

There are costs associated with implementation of this Modification Proposal. NGD is fully supportive of the User Pays cost recovery framework identified in the Draft Modification Report.

Implementation:

This Modification Proposal can be implemented with immediate effect upon expiry of 16 Business Days following determination by the UNC Modification Panel.

Legal Text:

NGD is satisfied that the drafting as published by the Joint Office meets the requirements of the Modification Proposal.

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

We would emphasise that at every stage of development of this Modification Proposal we have sought to ensure that Users are provided with an opportunity to validate and update to the Supply Point Register any Meter Information notifications provided to them by the Transporter. The purpose of the Proposal is to provide a remedy where the User does not take appropriate and timely action. The User is also able to advise the Transporter that the update would be inappropriate or erroneous or request additional time to validate the Transporter's notification. We anticipate that updating of meter asset data by the Transporters should be undertaken by exception and should not be routine. It is our intention to monitor User performance in this respect. This is analogous to the 'must read' Meter Reading arrangements found in UNC TPD Section M3.6.

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

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

Yours sincerely,

Chris Warner
Network Code Manager, Distribution