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Your Reference:UNC Modification Proposal 0518

UNC Modification Proposal 0518 – Shipper Verification of meter and address details following system meter removals

Dear Bob,

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

Do you support or oppose implementation?

Support

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

Transporters carry out a large number of Gas Safety (Installation and Use) Regulations GS(I&U)R site visits every year on behalf of Gas Suppliers and for a sizable number of these the Transporters identifies that a Supply Meter remains connected to the gas service (in 2014 alone there were 2600 GS(I&U)R jobs referred to National Grid Distribution (NGD) in which following either customer contact or site visit, a Supply Meter was identified as being connected to our network).

It can be distressful for customers where a Transporter contacts them, often on an unsolicited basis, to advise that their premises is required to be disconnected from the gas network. It is also inefficient (and unnecessary) for Transporters to carry out site visits to properties to satisfy the previous Gas Suppliers GS(I&U)R requirements simply as the result of an erroneous Supply Meter Point Isolation file flow or where a Shipper User has carried out an incomplete meter exchange notification. Shipper Users also may now incur charges associated with 'aborted' site visits under UNC modifications 0424 and 0425.

This Modification Proposal provides Shipper Users with an opportunity, 3 months in advance of Transporter involvement in the GS(I&U)R process to scrutinise their list of Meter removals (6 month previously) to validate the presence of a Supply Meter on site which remains connected to the Transporters network. This proposal if implemented would mitigate against the likelihood of unnecessary site visits by Transporters, thus avoiding inconvenience for gas customers and parties incurring avoidable costs.

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 is a self-governance modification as it is not expected to have a material impact on competition or consumers.

Relevant Objectives:

- d) Securing of effective competition:
 - (i) between relevant shippers;
 - (ii) between relevant suppliers; and/or
 - (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.
- f) Promotion of efficiency in the implementation and administration of the Code.

NGD concurs with the comments in the Draft Modification Report concerning the facilitation of these relevant objectives.

Impacts and Costs:

We agree with the statement in the Draft Modification Report concerning the impacts and funding of this Modification Proposal and we have no further comment in this respect.

Implementation:

We are in agreement with the implementation timescales identified within this Modification Proposal.

Legal Text:

There are a number of erroneous terms used within the Legal Text which we believe require amending before insertion into the UNC.

3.9.1(a) '*Supply Meter Point*' removal requires amending to '*Supply Meter Point Isolation*'

3.9.1 refers to a new defined term '*Supply Meter Point Removal report*' but then 3.9.2, 3.9.3 and 3.9.5 refers to the term '*Supply Meter Point Disconnection Report*'

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

We have not identified any further issues or concerns.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 01926 655299 (andy.clasper@nationalgrid.com) should you require any further information.

Yours sincerely,

Andy Clasper
National Grid Distribution