Representation - Draft Modification Report UNC 0570

Obligation on Shippers to provide at least one valid meter reading per meter point into settlement once per annum

Responses invited by: 5pm 10 August 2017

To: enquiries@gasgovernance.co.uk

Representative:	Andrew Margan
Organisation:	Centrica Plc
Date of Representation:	4th August 2017
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

The CMA review decided to introduce remedies for more accurate and frequent updates of supply point consumption to improve the allocation of energy. One of these remedies was an order to submit reads as soon as they become available and at least once per year. See Standard Condition 11 of the Gas Shipper Licence and Standard Condition 21B of the Gas Supply Licence.

We agree with the principle that shippers should take reasonable steps to obtain these reads and submit them into settlements, as more reads will ensure more accurate settlement of energy. More accuracy should have a positive impact on competition.

We support placing these obligations into Code. Therefore we support this proposal.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

Implementation should be aligned to the implementation of the April 2018 CMA Gas Settlement Order.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

System and delivery costs are already covered by the Gas Settlement Order. This modification should not have additional costs over and above delivery of the CMA Order.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

None identified

Please provide below any additional analysis or information to support your representation

N/A