

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:	Maitrayee Bhowmick-Jewkes
Organisation:	Npower
Date of Representation:	10/08/17
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

Npower believes that this modification fulfils the CMA order's requirement for annual reads, which is ultimately beneficial for industry settlements. Also, increasing the number of meter readings submitted into the settlement system should lead to an increase in the accuracy of gas settlements and allocation.

We therefore support this modification and agree that the obligation to take a meter reading at least once every year for billing purposes for non-daily metered sites, should be put into the UNC.

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

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

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

There are no additional costs and impacts from implementing this change.

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.*

No

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

N/A