

## Representation - Draft Modification Report UNC 0692S

### Automatic updates to Meter Read Frequency

Responses invited by: **5pm on 12 December 2019**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Edward E. Fyfe
<b>Organisation:</b>	Scotland Gas Networks and Southern Gas Networks
<b>Date of Representation:</b>	11 <sup>th</sup> December 2019
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	d) Positive

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

We support this modification as we would support any proposal to help tackle the issue of Unidentified Gas.

Following the implementation of UNC Modification 0638V, all sites with a Rolling AQ equal to or greater than 293,000 kWh and/or Smart or Advanced metering should have a monthly read frequency. However, there continues to be a significant percentage of these sites that are failing to meet this obligation. For example, the percentage of SMPs with no accepted read over 3 months is 13.08% for sites with Smart equipment, and 8.03% for sites with an AQ greater than 293,000kWh. In February 2019, the Supply Point Register showed over 7 million meter points that should be monthly read but were in fact 6-monthly or annually read.

The Unidentified Gas (UIG) Task Force (as established under UNC Modification 0658) has identified that low rates of meter read performance can be a significant contributing factor to UIG. We feel this modification will help address this issue, and therefore support the modification fully.

#### Self-Governance Statement: *Please provide your views on the self-governance statement.*

We agree with the Self-Governance Statement within the modification that this is a non-material change.

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

As soon as reasonably practicable. Implementation should be sixteen business days after any Modification Panel decision to implement.

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

No SGN costs or system development has been identified.

**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**

None to add.