

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

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

Representative:	Kirsty Dudley
Organisation:	E.ON
Date of Representation:	
Support or oppose implementation?	Qualified Support
Relevant Objective:	d) Positive

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

We support the principle of enabling the CDSP to have the ability to update Meter Read Frequencies under the criteria set out within this modification.

We are however not supportive of the proposed implementation date. We don't believe that timings for the Shipper data cleanse activity has been factored in to deliver without it triggering CDSP activity.

Additionally, we believe Shippers will need to develop systemised capabilities to receive MRF changes and amend system processing to ensure read processing adheres to any changes made to MRF's. With likely system changes required to deliver this it would ideally have 6 months implementation.

We have provided feedback reflective of these comments to XRN 4941 which closed on 02/12/2019.

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

We agree the change should follow the Self-Governance process and doesn't require authority consent.

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

Our qualified support is based on the implementation date rather than the solution proposed, we support a 6-month lead time and based on mod and XRN approval timelines. It would not meet June 2020 release and therefore we propose Nov 2020 instead (also covered in our response to Comms 2489.11).

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

There will be costs associated to the system changes for the data cleanse as well as the further changes outlined in the XRN.

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

We have no comments on the legal text.

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 noted.

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

Nothing additional to add.