

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:	Oorlagh Chapman
Organisation:	Centrica
Date of Representation:	12 December 2019
Support or oppose implementation?	Oppose * <i>delete as appropriate</i>
Relevant Objective:	d) None * <i>delete as appropriate</i>

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

The benefits proposed by this modification would derive from better aligned MRFs allowing better information to be sent to Shippers about overdue meter readings, and hence better read submission rates. We suggest a reporting solution would deliver a better outcome than a code change. All smart meters are required under the current code (the existing 5.9.1(d)) to provide a read once a month, which is the crucial requirement that drives the benefit of up to date AQs (and hence reduced impact on UIG). While having the MRF correctly set to monthly by xoserve will have the minor benefit of allowing even more frequent reads (e.g. weekly), this change will provide no additional motivation for shippers that are not delivering monthly smart reads in PC4 today. This change removes the “all reasonable steps” qualifier to providing smart reads once per month, which had the intent of covering off unresolvable communication issues with smart meters e.g. where SMETS1 meters may lose smart capability on change of supplier. While this nuance is captured in the proposed business rules, we feel the proposed legal text introduces an additional and undue code compliance risk.

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

We agree the modification does not require authority consent.

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

It is necessary to develop and implement system changes to receive and process MRF changes, therefore a minimum of 6 months would be required for implementation.

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

Costs will be incurred to develop the required system changes

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