

Consultation Response**iGT0XX: Identification of Supply Point Meter
Point Pressure Tier**

Responses invited by: 29/09/2016

Respondent Details

Name: Cher Harris

Organisation: Indigo Pipelines

Support Implementation ☐

Qualified Support ☐

Neutral ☐

Do Not Support ☒

Please briefly summarise the key reason(s) for your support / opposition

We do not support this proposal as we feel that the proposed solution will not meet the stated objectives.

Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

Agreed

Please state any new or additional issues that you believe should be considered

The proposed solution, of providing a pressure tier at Postcode level, will not be sufficiently robust to meet the stated objectives of reducing the use of GT1 requests. There are a number of problems with the proposed solution, but the main issues are:

- mixed sites, where for example you might have several domestic properties that are metered at low pressure but a commercial on the same development that is at medium pressure. These would all be on the same postcode so would we report it as Low or Medium pressure?
- Because we work in the New Connection market, we have a lot of dummy postcode incodes, e.g. 1XX, whilst we are awaiting confirmation of the actual postal addresses. This could likely lead to several different projects being amalgamated under the same postcode. How should these be reported if for example there was a mix of low and medium pressure supply points? Furthermore, if the Shipper/Supplier is searching on the postcode provided by the end customer, they will not find a match if we still hold the dummy postcode.
- The Mod states that pressure is required at mains level, however, in order to send appropriate staff and metering equipment the pressure tier should be identified at ECV level as this is where the works are to be carried out and this can often be at a lower pressure than the main.
- We see a benefit to Suppliers in progressing this proposal for domestic properties, as this could potentially assist Smart Roll Out, but I would not want to see this proposal include I&C sites. The GT1 process is important to us for managing third party connections to I&C sites on our network. The GT1 request is often the only notice we get that a shipper/Supplier has instructed a MAM to install a meter, as I&C Shippers/Suppliers are generally poor at registering the MPRN prior to meter installation. We would not be happy to provide data publically that makes it even easier for Shippers/Suppliers to install meters without registering.

Relevant Objectives**How would implementation of this modification impact the relevant objectives?**

We agree that the intentions of the Mod, to reduce reliance on the manual GT1 process for smart meter roll out, would meet objectives A & C, however because the proposed solution is fundamentally flawed, it will not actually meet these objectives.

Impacts and Costs**What development and ongoing costs would you face if this modification was implemented?**

We already hold this information so costs would be dependent on the solution for displaying the data (cost of a centralised hosted website). Alternatively we could consider adding the data in the existing monthly Shipper Portfolio Extracts, though this too would incur some costs of making the code changes to the file extract. As the solution is not yet clear, precise costs cannot be provided at this time.

Implementation**What lead time would you wish to see prior to this modification being implemented, and why?**

6 months minimum to negotiate a contract for a centralised hosted website and to design, build, test & implement a new data extract file.

Our preference would be to implement after SSP.

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

The legal text adequately defines the proposed solution, but as the solution itself will not deliver the objectives of the Mod, then the legal text does not deliver the intent either.

Further Comments**Is there anything further you wish to be taken into account?**

Responses should be submitted by email to iGTUNC@gemserv.com