

Consultation Response**iGT075: Identification of Supply Meter Point****pressure tier****Responses invited by 29 09 2016****Respondent Details****Name:** Kishan Nundloll**Organisation:** ESPUG**Do Not Support**

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

ESPUG understand that the mirroring UNC565 modification was rejected as the GDNs chose to implement the solution without the obligation introduced into the UNC. ESPUG feel that iGTs should not have an obligation placed upon them as we could be left in a difficult position should the GDNs stop providing that data, of which we are dependent on to produce our own. It would be reasonable for the iGTs to mirror the GDN approach and provide the data on a voluntary basis, in a standard format agreed by all iGTs.

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?

Agree that the modification does meet the self-governance criteria.

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

ESPUG firmly believe that the below statement from the modification is not relevant due to the proposers acknowledgement that this is being used to describe a likelihood. The proposer has not presented any facts or evidence related to aborted visits at iGT supply points.

AMO members have indicated that in the domestic sector the aborted visits are in the order of 1 in 1000 visits, which over the life of the smart meter roll-out could equate to 25,000 aborted calls, with the associated cost and customer frustration. These are whole market figures irrespective of network operator, and iGT pipelines will have significantly less, but to understand the impact solely on iGT networks, it may not be directly proportional to the number meter points considered, but rather relative to the likelihood of higher pressure tier networks built

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

As ESPUG do not agree with modification, we do not believe that the objectives would be fully reached.

Impacts and Costs

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

ESPUG will have high internal costs and have a negative impact on other projects. There is also a constraint on resource if this is to be developed in parallel with the run up to Nexus Go live and the ramp up of OFGEM's faster switching programme.

Implementation

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

As ESPUG do not agree, there is no implementation date that would satisfy us.

Legal Text

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

The legal text is robust and has captured the intention of the modification.

Further Comments

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

N/A

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