

iGT UNC / iGT INC Consultation Response

Date	13 May 2013
Reference	iGT047 DMR Consultation
Title	Inclusion of data items relevant to smart metering into existing industry systems
Respondee	Anne Jackson
Position on the Modification	Qualified support for Modification

Facilitation of the relevant objectives

How this proposal will, if implemented, better facilitate the "code relevant objectives", as defined in Standard Condition 9 of the Gas Transporters Licence. For those answered Yes to, please provide a detailed explanation below the table.

Relevant Objective	Yes/No
a. the efficient and economic operation of the pipe-line system to which this licence relates	
b. so far as is consistent with sub-paragraph (a), the coordinated, efficient and economic operation of the pipe-line system of one or more other relevant gas transporters	
c. so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence	
d. so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers	POSITIVE
e. so far as is consistent with sub-paragraphs (a) to (d), the provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers	
f. so far as is consistent with sub-paragraphs (a) to (e), the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code referred to in paragraphs 2 and 5 respectively of this condition	NEGATIVE
g. so far as is consistent with sub-paragraphs (a) to (f), the compliance with the Regulation* and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators	

* Regulation 2009/715/EC of the European Parliament and of the Council of 13 July 2009

Relevant Objectives to be better facilitated:

Relevant objective (d) is better facilitated i.e. securing of effective competition between relevant suppliers by enabling suppliers to have access to smart data, which will allow them to efficiently effect the change of supplier process.

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There is a negative impact on relevant objective (f) the promotion of efficiency in the implementation and administration of the Code as the mod implies further Code changes will be necessary to enable the support of both the foundation and enduring solutions for smart meter roll-out. This introduces inefficiencies into the process.

Likely impact on environment?

None identified

Implementation issues including impact on your systems

These arrangements are only supported as an interim solution and are not an ideal solution for a mass and accelerated meter exchange programme. These additional elements to an already weak governance structure for metering arrangements and the related data updates within the iGT UNC are expected to lead to data discrepancies which will ultimately impact consumers at change of supplier.

Our support is linked closely with an assumption that iGT's processes will be administered by xoserve through Project Nexus.

Although this mod does not address the cost recovery arrangements it is accepted that shippers (and ultimately suppliers) will contribute significantly as the main beneficiaries of this modification. However we would expect a contribution / investment from iGT's where changes could reasonably be expected for any business in an evolving market. Additionally as businesses grow in size, solutions must become more robust in order to provide assurance of data integrity, security etc. and any cost apportionment should make allowances for this.

Additional Information and Comments

This mod enables transporters to collect and pass data to the licensed Data Communications Company (DCC), thereby facilitating the rollout of smart metering.

During the development of the modification there was some discussion about the existing governance around particular pieces of information, for example supplier identity. It appears that the existing governance has been interpreted differently by the iGTs and we would have expected this to be resolved in this modification by clarifying these particular definitions in order to ensure the effectiveness and successful delivery of the objectives for his modification. So for example in the case of supplier ID, that the data item is collected and stored by all iGT's at registration rather than being provided as a data item for every smart meter that is fitted.

Comments on the legal text:

D .2.10

The clause requires action within 4 Days but there is no reference point for from when the 4 Days count applies. Additionally Pipeline Users can only meet this obligation on receipt of this information.

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For suppliers own MAM's this can be assured through commercial contracts, but this cannot be assured where the meter has been fitted by the transporter, so we would like this exception to be acknowledged in the legal text.

Appendix D-1 & K-3

Registered Metering Applicant' is defined by 'For the purposes of Clause 40.1 the "Registered Metering Applicant" is any person who has been registered to request and receive Supplier identity from the Pipeline Operator pursuant to an appropriate registration scheme administered by the Pipeline Operator.' and we do not feel this definition is appropriate to define a MAM. The definition of 'Meter Asset Manager' is better. However it would not be possible to provide MAM details for iGT owned (as defined by the Gas Act) as no MAM has been appointed or is working for 'another' as defined. For iGT owned meters, suppliers would not be able to apply to obtain any information on these meters as there is no contract between the parties or any formalisation of the relationship been made or agreed.

Completed forms should be returned to the iGT UNC Representative, Gemserv Ltd at iGT-UNC@gemserv.com or faxed to 020 7090 1001