

IGT UNC
IGTUNC@gemserv.com

12 May 2020

Dear Sir or Madam,

Re: IGT142 Allow Users to submit Estimated Meter Reading during COVID-19

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

NGN supports this Modification Proposal.

We support the use of this solution where the submission of a consumer provided read is not a viable option. The proposal should further Relevant Objective d) *Securing of effective competition* by allowing Pipeline Users to submit Estimated Meter Readings in instances where an Actual Meter Reading is unable to be obtained due to the COVID-19 period restrictions, thus allowing reconciliation and AQ calculations to continue as normal and ensuring allocations are as accurate as possible, and should also ensure consistency with Large Transporter sites.

We would hope that the Performance Assurance Committee (PAC) could introduce monitoring of uptake and effectiveness of this modification. We would also encourage there to be additional monitoring as to the volume and timing of actual reads being received after the end of the relevant COVID-19 period.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Tracey Saunders (via email)
Market Services Manager (Industry Codes)
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