

Consultation Response

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

Responses invited by: 12 May 2020

Respondent Details

Name: Paul Bedford

Organisation: Opus Energy Ltd

Support Implementation ☒

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

Due to COVID-19 lockdown, there is an increased likelihood of failure to obtain accurate reads due to unavailability of meter readers, restricted access to meters due to closed premises and limited opportunity to take corrective measures with respect to faulty AMR meters. Lockdown has also impacted gas usage, including actual usage deviating significantly, either up or down, from the AQ.

We therefore support this proposal that Users are permitted to submit estimated Meter Readings for Non-Daily Metered Class 3 and 4 Supply Meter Points during the COVID-19 pandemic because Shippers require a mechanism to ensure that sites that are currently inaccessible can register an estimated reading that is more representative of actual consumption. This will avoid the material impacts of incorrect allocation based on AQs that are no longer representative of consumption. We believe this proposal is positive for Relevant Objective (d).

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?

Yes, we agree that this should not be a self-governance modification.

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

N/A

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

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Impacts and Costs

Process impacts only.

Implementation

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

This change has been granted urgent status due to the unprecedented impacts of COVID-19. Given the urgency, the proposed solution has necessitated one that has no system impacts and required process updates, and so could effectively be implemented immediately following approval.

We are conscious that the development of this proposal has been rapid with little opportunity for industry to analyse all potential consequential impacts that may need to be mitigated. For instance, there has been no opportunity to understand how the provisions would operate if parts of GB (e.g. geographic regions or specific industries) were still under COVID measures or COVID measures currently in force were lifted and then reinstated under the same powers.

Legal Text

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

Legal text requires definition of the Relevant Period that the modification would apply from and when it would end. It is unclear at what stage/trigger, other than the end of the Government's COVID-19 provisions would necessitate removal of this section from the Code.

We agree that Shippers should be required to maintain a record of the basis on which estimates have been calculated for a period of two years following the end of the Relevant Period.

Further Comments

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

The PAB may need to establish working groups to ensure that any potential unintended consequences of this temporary solution are mitigated.

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