

Consultation Response

IGT142U: Allow Users to submit Estimated Meter Reading during COVID-19

Responses invited by: 12 MAY 2020

Respondent Details

Name: Sasha Pearce

Organisation: npower

Support Implementation ☐

Qualified Support ☐

Neutral ☐

Do Not Support X

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

We understand the intent of this Modification is to ensure that shippers have a mechanism for estimating consumption at sites where there have been changes in usage as a result of COVID-19. However we have a number of concerns about this proposal:

How can accuracy of estimation and consistency across shippers be ensured? Will a blanket x% reduction be made and will estimation happen at a site level based on customer provided information?

Would these reads need to be flagged so they were not used in future post covid19 or post Lockdown AQ calculations or how will they be considered?

We consider that submitting estimates now will lead to a whole host of problems as the reads will be based on the current AQ when many sites are on lockdown and could have reduced consumption. That will potentially cause negative consumption rejections on actual reads when these start up again.

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?

We agree with the proposer that this should **not** be a self-governance modification.

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

None

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

Given our concerns outlined above, we do not believe that this Modification will facilitate the relevant objectives.

Impacts and Costs

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

None

Implementation

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

No lead time required, implementation could follow immediately after approval.

Legal Text

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

No comments

Further Comments

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

No comments