

Consultation Response

IGT159: Amendments to the Must Read Process

Responses invited by: 20TH September 2022

Support Implementation ☐

Qualified Support ☒

Neutral ☐

Do Not Support ☐

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

Qualified support is given to this change proposal on the basis that the legal text is amended to include the notification from the CDSP to the Pipeline Operator when a Pipeline User has notified the CDSP of a meter issue.

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?

As the Modification would have material impacts on consumers, we agree that IGT159 should be an Authority decision.

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?

Without the amended legal text, we disagree that the Relevant Objectives D and F are fully achieved. The process is further complicated and made inefficient where the Pipeline User attends site to obtain a meter read and be unable to charge for that visit because they have not been advised of the existing meter issue. The customer is further inconvenienced by this additional and needless visit.

Impacts and Costs

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

Should the amendment to the legal text be made, and the modification approved, there will be additional costs to IGTs which are unclear at this stage due to the change and funding process by the CDSP.

Implementation

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

If the legal text is amended, we agree that the mod should be implemented as soon as possible following an Authority decision to approve and in alignment with the delivery and go live of the CDSP solution. However, when considering the two implementation Options set out in the ROM the preferred Option 1, is dependent on the success of the CMS delivery.

Legal Text

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

No. We believe that there should be a reciprocal arrangement added into the business rules, and therefore the legal drafting, for the CDSP to notify an Pipeline Operator where a Pipeline User has identified a known issue.

We understand that this was discussed within the working group and a proposed solution may have involved the CDSP removing those sites from the Must Reads pot where a meter issue has been reported to the CDSP by the Pipeline User, but there is nothing within the legal text to support this and, therefore, would be nothing in governance, for any such option to mandate this.

Further Comments

It is unreasonable to direct that an IGT should visit site to obtain meter reads where they are unable to recover the costs of that /those visits. The result of this modification in its current form would introduce that concept into governance. The legal text is incomplete in its current form and introduces unnecessary costs to the Pipeline Operator and causes unnecessary inconvenience to the end consumer.

On the basis that a new paragraph 11.6 is added to the effect “...*Where the Pipeline User has notified the CDSP of a known meter issue the CDSP shall notify the relevant Pipeline Operator of said known meter issue...*” then the change proposal will be supported.

On the basis that the legal text is not amended to reflect this, then the change proposal will be rejected.

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