

Consultation Response

IGT159: Amendments to the Must Read Process

Responses invited by: 20th September 2022

Respondent Details

Name: Gethyn Howard

Organisation: Last Mile Asset Management

Support Implementation ☐

Qualified Support Y

Neutral ☐

Do Not Support ☐

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

We are broadly supportive of the intent of the change proposal on the basis it provides a more defined set of rules around the collection and provision of must reads. We do however have concerns around the drafting where there is a gap regarding the provision of information to IGTs which would leave IGTs exposed to unrecoverable costs.

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 this modification should not be a self-governance modification.

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

As stated in the above section, we note that there is a gap in the legal drafting whereby though Shippers are able to notify the CDSP of meters which should be excluded from the must read process, there is no obligation on the CDSP to notify IGTs of these changes. Without this obligation, the IGTs will receive inaccurate notifications of which meters require a must read, which under the current proposed drafting, would result in IGTs not being able to recover their costs for the provision of associated reads.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

(A) Efficient and economic operation of the pipe-line system **None**

B) Co-ordinated, efficient and economic operation of

(i) the combined pipe-line system; and/or

(ii) the pipe-line system of one or more other relevant gas transporters **None**

(C) Efficient discharge of the licensee's obligations **None**

(D) Securing of effective competition:

(i) between relevant Shippers;

(ii) between relevant Suppliers; and/or

(iii) between DN operators (who have entered into transportation agreements with other relevant gas transporters) and relevant Shippers **Positive** *in so much that actual read provision results in more accurate billing to end users, improving their customer experience. The reduced timeframe for the provision of reads also ensures provided reads are representative of use at that time, again supporting more accurate billing to end users.*

(E) 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 **None**

(F) Promotion of efficiency in the implementation and administration of the Code **Positive (subject to inclusion of additional legal drafting)** *in so much that greater clarity is provided to which meters are subject to the must read process.*

(G) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators **None**

Impacts and Costs

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

Insert text here

Implementation

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

The lead time of this proposal should be linked to the implementation any Xoserve changes to provide IGTs with amended must read reports. Recent discussions have indicated that this could be sometime in Q2-Q3 2023 at the earliest.

Legal Text

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

Not fully – see comments within response.

Further Comments

Should a reciprocal arrangement be added into the business rules, and therefore the Legal Drafting, for the CDSP to notify an IGT where a Shipper has identified a known issue. *(Please see "Panel Discussions" in Section 10 of the [Draft Modification Report](#) for further context and information)*

Yes, we believe this needs to be included in the legal drafting. The implementation date of this modification if approved should also align to the go live date of any CDSP changes required to provide the updated report.

Further Comments

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

Our qualified support is provided on the basis the following amendments are made to the modification:

- 1) That the legal text requires the CDSP to inform IGTs of sites removed under the new criteria; and
- 2) On the basis point 1 above is addressed that the implementation is aligned to the date that the CDSP can deliver the changes.

Without these changes we will be unable to support the modification.

Alternatively, the proposer may wish to consider removing the criteria which would require the CDSP to make reporting changes and simply include the revised timeframes for IGTs to provide must reads.

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