

## **Scottish Power comments on the Proposed Allocation of Unidentified Gas Statement (AUGS) for 2019/20**

**4 February 2019**

Dear Clive/Tony/Andy,

2019\_25:

After your good initial investigation into the issue of static correction in October I'm sorry to say that I was disappointed to see in January the methodology had been updated to incorporate a pressure adjustment but not a temperature adjustment.

This is quite an omission by DNV.

I also think the question was not framed correctly, and could be taken as disingenuous... it should not be 'what temperature would be more correct', it should be 'how can the UIG factors more accurately reflect the effect and its distribution'.

It does not reflect well that AUGS has failed to make a proposal that industry can work with. There are many suggestions and some of these were discussed yesterday.

My view is that AUGS should, as the acknowledged expert, making the rational case for a more accurate treatment.

And that might include being prepared to engage parties to raise awareness and understanding across the industry.

Without the latter there can be no informed majority mandate from the industry, and that runs the risk of a treatment that is inaccurate at best and partisan at worst.

I look forward to contributing to proposals in this complex area in the coming weeks with the objective of ensuring a treatment is incorporated into 2019/20 Factors.

Kind Regards,

Mark Bellman