

Representation - Draft Modification Report UNC 0819 Establishing/Amending a Gas Vacant Site Process

Responses invited by: 5pm on 16 November 2023

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Edward Allard
Organisation:	Cadent Gas Limited
Date of Representation:	15 th November 2023
Support or oppose implementation?	Support
Relevant Objective:	d) Positive
Relevant Charging Methodology Objective:	Not Applicable

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

Cadent are principally supportive of this modification, as it proposes a solution that, if implemented, would allow a Class 4 Supply Meter Point to more accurately reflect its AQ in line with the process of functioning SMART/AMR Vacant Class 4 Supply Meter Points. We agree that this has the potential to further relevant objective d) (i) – Securing effective competition between relevant shippers.

In particular, this support is based upon the below processes operating effectively as described in the Draft Modification Report:

- The Performance Assurance Committee (PAC) receiving the *additional reporting on the count of Supply Meter Points where the CDSP have been notified of the Vacant criteria, the total count of Supply Meter Points where the Vacant criteria is currently applied, and the durations that Supply Meter Points have held the Vacant status. We believe that this additional reporting is an important control in assuring that the Vacant process is used appropriately.
- That the CDSP will implement the necessary system changes, knowledge, and training amongst its employees and subcontractors, so as to ensure that Supply

Meter Points with Vacant status requests are effectively validated against the Vacant Site Guidance Document criteria.

*NB: We recognise that the Vacant site reports to be shared with PAC, listed in the Draft Modification Report were referenced as “likely to include” and are not finalised at this stage. However, our support for this modification is based on the principle that the finalised reports to be shared with PAC include a sufficient level of detail to enable effective oversight and challenge (where appropriate).

Implementation: *What lead-time do you wish to see prior to implementation and why?*

The modification should be implemented as soon as reasonably practicable following authority decision and the enactment of the relevant CDSP system changes.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

No costs or impacts identified.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

As Legal Text provider we are satisfied that it meets the intent of the Solution.

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

None

Please provide below any additional analysis or information to support your representation

Nothing further to add.

We trust that this information will assist in the compilation of the Final Modification Report.

Please contact me on 07891670444 (Edward.allard@cadentgas.com) should you require any further information.