

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:	Tom Stuart
Organisation:	Wales & West Utilities
Date of Representation:	6.11.23
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)

WWU supports this modification as we agree with the principle of aligning the proposed vacant status criteria within the AQ correction process to treat dumb metered sites in the same way as Smart and AMR sites. We believe this modification is positive in furthering relevant objective d) Securing of effective competition: (i) between relevant Shippers.

Our support is based upon the outcome of workgroup discussions:

Application of the customer charge - It was confirmed in Workgroup that as this modification introduces a change to the vacant status criteria, and does not alter the AQ correction process itself, the charges for vacant sites will be treated in the same way across class 4 and the customer charge will still apply where it is already applicable.

Reporting – We would also like to highlight that the role of the PAFA and PAC is integral to the correct use of the new vacant status criteria. There is a risk that without sufficient proactive monitoring and periodic validation of a vacant sites eligibility a site could incorrectly remain vacant. We therefore support the development of PARR reports to monitor compliance.

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

The modification should be implemented as soon as possible following a decision from the authority.

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

None

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

Yes

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

None