

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:	Kevin Woollard
Organisation:	Centrica
Date of Representation:	16 th November 2023
Support or oppose implementation?	Support
Relevant Objective:	d) Positive
Relevant Charging Methodology Objective:	Not Applicable* <i>delete as appropriate</i>

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

By providing Shippers with the ability to reduce Transportation Costs to reflect actual usage it will ensure that Shippers are not paying unnecessary costs, noting that this would be particularly useful to the smaller market participants that might not have access to large amounts of cashflow for unnecessary costs, therefore promoting Relevant Objective d) Securing of effective competition: (i) between relevant Shippers; (ii) between relevant Suppliers. Specifically, improved alignment on AQ correction between meter types in the case of vacant sites will remove distortive impacts between Shippers caused by differences in the prevalence of “dumb” meter vacant sites in their portfolios.

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

The modification should be implemented as soon as reasonably possible following evaluation by the Xoserve.

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

We do not anticipate any significant costs.

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

We are satisfied that the legal text will deliver 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.*

We have not identified any errors or omissions.

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

Some additional points regarding this modification to support its progression are detailed below.

Performance Assurance

Appropriate checks and balances have been developed to ensure there are robust processes for qualification and maintenance of Vacant site status. The design of the Modification includes detailed criteria (The criteria is drawn from the already established Electricity P196 Vacant process) which a Shipper must follow and evidence for a site to be entered and remain in a Vacant status.

As the process impacts settlement it will fall under the now established Performance Assurance Committee and associated frameworks.

The UNC related guidance document for this modification includes “Please note that this process will fall into the remit of the Performance Assurance Committee (PAC) and Shippers may be called upon to justify their position”.

Safety

The criteria in Modification 0819 states that once a site has been entered into a Vacant status the Shipper must attempt to visit the Meter every 6 months. We believe this creates a more frequent and robust process than is currently in place for these Meters to be visited and monitored to address any potential safety concerns.

Isolation and the Vacant Sites Process

Modification 0819 is designed for Vacant sites with no access to the Meter. The isolation process will remain independent from and unchanged by this modification and Shippers will need to isolate where it's correct to do so.

Alignment across meter types

Modification 0819 provides Shippers access to commodity, capacity and settlement read obligation relief for Vacant sites where Meter readings cannot be obtained. This modification is for Standard and Non-Active SMART Meters and provides access to the same relief as an Active SMART Meter would gain after polling non incrementing reads for 12 months: an AQ of 0.

Alignment with Electricity Processes

This proposal brings the gas market in line with processes already established within the electricity market for vacant sites.