

Representation - Draft Modification Report UNC 0632S

Shipper asset details reconciliation

Responses invited by: **5pm on 08 March 2018**

To: enquiries@gasgovernance.co.uk

Representative:	Kirsty Dudley
Organisation:	E.ON
Date of Representation:	08/03/2018
Support or oppose implementation?	Qualified Support
Relevant Objective:	f) Positive

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

We support the principle outlined and support ensuring data accuracy is maintained in central systems for smart and AMR.

Our qualified support is centred around the report issued, this is stipulated as a one-off report 3 months after implementation, however, with rollout and other activities we would prefer reports to be issued between now and rollout completion. Although the initial report would highlight any present day issues it doesn't however act to mitigate future ones, which we believe additional reports would provide. The report has no additional costs as a one off so we do not believe the introduction of further reports e.g. twice a year, would change this.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

We do not believe there are any impacts which would be classed as material and therefore support this being progressed as self-governance.

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

We would support implementation which coincides with the standard release dates, the next being June 2018 with the report issued no later than Nov 2018.

If the report is not already created and requires DSC work to deliver, it is not clear within the modification how it links to the DSC deliverables, our preference would be it aligns with R3 delivery (aligning with suggested Nov 18 date) but we recognise it could also be included in a smaller release with an adhoc date given by DSC change. There is no associated XRN noted in the mod to accompany report creation.

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

We anticipate costs relating to the review of the reports but we would class this as a smaller change so wouldn't incur significant costs.

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

We would perceive 1.3.5 TPD Section M2.1.13 and M2.1.14 as a sunset clause which would no-longer be required post the one-off report. We do not see where code is treating this as such and prefer either it is made clearer if it remains one off, or, expanded if it is to be made a regular report.

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.*

No comments

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

No additional comments.