

Representation – Modification UNC 0634 (Urgent)

Revised estimation process for DM sites with D-7 zero consumption

Responses invited by: **5pm on 03 November 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Lorna Lewin
Organisation:	DONG Energy
Date of Representation:	3 November 2017
Support or oppose implementation?	Oppose
Relevant Objective:	d) Positive/Negative/None* <i>delete as appropriate</i>

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

Whilst we acknowledge the intention of this modification to address the unidentified gas volatility issues, we do not believe this modification will achieve this objective.

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

We do not support implementation

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

Given the urgency of the modification, we have not been able to fully assess any costs.

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

We have not reviewed the legal text.

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

NA

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

This modification would fundamentally change the way zero consuming sites are handled, and could potentially lead to genuine zero consumptions being changed to an erroneous consumption

value. Xoserve has confirmed that DM sites only contribute to 1% of the UIG and 10 sites are the main contributors. Xoserve also confirmed that out of the 31 zero consuming sites, 21 appear to be genuine (based on historic data). None of the remaining 10 sites are contributing the UIG issue, which means this modification if implemented will not address the UIG issue.

We recognise that this modification would address a very small number of incorrect zero consuming sites, however there has been insufficient time to develop an appropriate method of allocating consumption to these DM sites.