

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:	Kathryn Turner
Organisation:	Good Energy
Date of Representation:	1/11/17
Support or oppose implementation?	Qualified Support
Relevant Objective:	None

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

We support this change in principle, but with the following caveat. Whilst we believe the proposal can be positive in encouraging DM sites to submit reads, we are concerned that it could be biased towards DM sites if no checks are undertaken by Xoserve upon the receipt of an “alternative consumption” read from the Shipper.

We would encourage Xoserve to undertake a validation of this alternative consumption, especially in case such as those where the read is close to incurring ratchet charges.

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

N/A

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

N/A

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

Not yet provided

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.*

None

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

N/A