

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:	Fraser Mathieson
Organisation:	Scotland Gas Networks and Southern Gas Networks
Date of Representation:	03/11/17
Support or oppose implementation?	Comments
Relevant Objective:	d) None

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

SGN supports the various initiatives currently underway aimed at reducing the daily levels and volatility of Unidentified Gas (UIG).

We understand that this modification aims to incrementally improve industry data and to halt the propagation of erroneous zero estimates throughout settlement.

Whilst we support the work currently underway in relation to UIG and the focus on improving industry data, we cannot see that sufficient evidence has been provided that shows how the current position in respect of either issue would be improved by implementation of this modification.

Workgroup discussions indicate that the number of sites affected by D-7 zero consumption are very low and therefore the materiality of this issue is commensurately low, and we would therefore question whether an enduring modification is an appropriate solution.

Additionally, we feel that further clarity and certainty would be required regarding the rules under which the CDSP would operate before this modification could be implemented.

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?*

None identified.

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

Updated legal text is not available.

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.*

No.

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

N/A.