

## Representation - Draft Modification Report UNC 0652

### Introduction of winter read/consumption reports and associated obligations

Responses invited by: **5pm on 14 March 2019**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Mark Bellman
<b>Organisation:</b>	ScottishPower
<b>Date of Representation:</b>	11 <sup>th</sup> March 2019
<b>Support or oppose implementation?</b>	Support/ <del>Oppose/Qualified Support/Comments</del> * <i>delete as appropriate</i>
<b>Relevant Objective:</b>	<b>d)</b> Positive/ <del>Negative/None</del> * <i>delete as appropriate</i>

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

Error in the profiling of consumption is a contributor to Unidentified Gas. This proposal will reduce UIG by better winter profiling for EUC03-09 sites.

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

ASAP.

The sooner this is implemented the more time shippers have to ensure they can comply and improve winter profiling.

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

None.

For those sites that are targeted by this Mod there should be no additional costs other than those required to comply with the existing UNC obligation (where those meters are >293 MWh) or the existing CDSP process for all other meters.

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

Yes (finally!)

**Modification Panel Members have requested that the following questions are addressed:** *Remove Section if no questions*

*Q1: Please provide clear views and supporting evidence on the self-governance status of this modification focusing, in particular, on whether this proposal is likely to have a material impact upon competition in the shipping, transportation or supply of gas.*

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**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

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