

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)

Representative:	Carl Whitehouse
Organisation:	First Utility
Date of Representation:	13 March 2019
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

The number of supply points currently within EUC bands 3 to 8 in a default WAR band is unacceptable and has been the case since the upgrade of UK Link central systems. This modification will help alleviate the issue of Shippers not submitting “winter” consumption and thus reducing daily Unidentified Gas volumes.

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

This modification should be implemented immediately following a direction from Authority.

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?

Yes.

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**