

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

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities Ltd
Date of Representation:	13 th March 2019
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

We support this proposal because it implements further measures to encourage Shippers to provide meter reads to enable calculation of Winter Consumption and hence the winter annual ratios (WARs). Accurate WARs should enable a more accurate allocation of gas to Non-Daily Metered Supply Meter Points and hence a reduction in Unidentified Gas (UIG) which is calculated on D+5.

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

We would support implementation as soon as possible although we note that the timings are tight to enable the report to be provided in May 2019.

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

WWU would not face any direct costs.

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

There are already provisions in the UNC requiring meter reads to be provided and it is not clear that provision of a report will greatly improve the situation. If the failure to provide reads is caused by lack of awareness of the impact then the report should help, if the failure to provide reads is caused by a deliberate decision it will not have an effect.