

## Representation - Modification UNC 0723 (Urgent)

### Use of the Isolation Flag to identify sites with abnormal load reduction during COVID-19 period

Responses invited by: **1pm on 27 April 2020**

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

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Danny Byrne
<b>Organisation:</b>	Utilita Energy Ltd
<b>Date of Representation:</b>	24/04/2020
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	a) Positive d) Positive

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

It will provide more accurate allocation across the industry.

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

Utilita will not require significant lead time to implement these changes.

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

Utilita would expect minimal costs for development.

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

Utilita are happy with the legal text.

#### 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.

None

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

These temporary measures are mentioned as being in place for the 'COVID-19 period', will this be left to UNC to determine and advise parties on when this period is over and the temporary measures are no longer in place? It leaves room for confusion and disparity between industry, should shippers need to determine this themselves based on Government advice.