

## Representation - Draft Modification Report UNC 0704S

### Transporter Theft of Gas Reporting

**Responses invited by: 5pm on 07 May 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>	David Mitchell
<b>Organisation:</b>	Scotland Gas Networks and Southern Gas Networks
<b>Date of Representation:</b>	6 <sup>th</sup> May 2020
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<b>c)</b> Positive <b>f)</b> Positive

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

SGN raised this modification following discussions at the 0677R Shipper and Supplier Theft of Gas reporting arrangements review group. At this work group it was identified that several of the Transporter Theft of Gas reporting items are duplicated across codes or are no longer fit for purpose. It was also noted that measures are reported at different points in the year which is not conducive to tracking performance. This modification will amend the monthly Transporter theft of gas reporting obligations in the UNC and will give greater visibility on the Transporters performance in this area. This change will allow the annual Transporter Theft of Gas Reporting in SPAA to be removed as the areas of reporting there will form part of this change.

**Self-Governance Statement:** *Please provide your views on the self-governance statement.*

This modification fulfils the self-governance criteria as it amends the existing Transporter Theft of Gas Reporting obligations and does not introduce any new processes furthermore it does not have any customer impacts.

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

We agree that the proposed implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

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

SGN does not anticipate any additional costs from implementing this modification.

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

As proposers of the modification we are satisfied 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.*

We have not identified any additional considerations that need to be considered.

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

N/A