

Representation - Draft Modification Report UNC 0672

Target, Measure & Report Product Class 4 Read Performance

Responses invited by: **5pm on 15 May 2020**

To: enquiries@gasgovernance.co.uk

Representative:	India Koller
Organisation:	Scotland Gas Networks & Southern Gas Networks
Date of Representation:	13/05/2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

SGN support this modification as it encourages the provision and availability of meter readings, furthering Relevant Objective d), *Securing of effective competition*, which should increase the granularity of consumption data and therefore should help to reduce the levels, volatility and unpredictability of UIG.

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

SGN supports the implementation of the meter reading targets as soon as reasonably practical. When assessing the performance reporting associated with this modification, PAC should take into consideration the current covid-19 lockdown and urgent implementation of modification 0722.

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

Modification Panel Members have requested that the following questions are addressed:

Q1: Views are requested on whether this Modification should be the subject of Self-Governance or Authority Direction?

Self-Governance. We don't see any material impacts on customers therefore we believe this Modification fulfils the criteria for self-governance.

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 identified

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

N/A