

Representation – Modification UNC 0634 (Urgent)

Revised estimation process for DM sites with D-7 zero consumption

Responses invited by: **5pm on 03 November 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Deborah Brace
Organisation:	National Grid NTS
Date of Representation:	3rd November 2017
Support or oppose implementation?	Oppose
Relevant Objective:	None

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

This Modification proposal is one of several currently being developed focussed on addressing industry concerns with the level and volatility of UIG. We understand this Modification proposal has been raised to eradicate false zero values from the use of D-7 estimates where no read is available. Whilst we support the work underway to look for solutions to the UIG challenges being experienced, we are concerned that the solution outlined within this Modification proposal may not lead to reductions in either the levels or the volatility of UIG. During the workgroup held on 26th October, Xoserve estimated that the solution was likely to have an impact on approximately ten sites. This proposal does not evidence the impact the solution may have on UIG levels or volatility and therefore a transitional solution may be more appropriate. There is a risk that this enduring solution may lead to a different misallocation of UIG in the longer term and on this basis, we are unable to support this proposal.

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

None

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

None

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

Not available

Are there any errors or omissions in this Modification 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