

Representation - Draft Modification Report UNC 0685

Amendment of the UNC term 'Gas Deficit Warning' to 'Gas Balancing Notification'

Responses invited by: **5pm on 21 May 2019**

To: enquiries@gasgovernance.co.uk

Representative:	Gerry Hoggan
Organisation:	ScottishPower Energy Management Ltd
Date of Representation:	21 May 2019
Support or oppose implementation?	Qualified Support
Alternate preference:	N/A
Relevant Objective:	a) Comment e) Comment

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

We are not entirely convinced of the need for the change as this appears to have been based only upon a subjective assessment of the potential impact of the current terminology, with little objective evidence having been advanced. Moreover, the change also appears largely targeted at public/media perception, rather than industry parties who should have a greater understanding of the underlying significance of the notifications, and as such the impact on the Relevant Objectives is difficult to assess. That having been said we offer qualified support if the wider belief is that the new wording is less capable of misinterpretation beyond industry circles.

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

We agree with the justification for an Authority Direction on this proposal as detailed within the draft Modification Report.

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

Implementation by 1st October 2019 would be preferable to ensure the new arrangements are in place ahead of winter 2019/20.

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?*

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.*

None

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

None