**Joint Office** of Gas Transporters

## Representation – Modification UNC 0700 (Urgent)
## Enabling large scale utilisation of Class 3

**Responses invited by: 5pm on 07 August 2019**

**To:** enquiries@gasgovernance.co.uk

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

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|---|---|
| **Representative**: | David Morley |
| **Organisation:** | OVO Energy |
| **Date of Representation:** | 02/08/2019 |
| **Support or oppose implementation?** | Qualified Support |
| **Relevant Objective:** | **f)** Positive |

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

We believe that the methodology provides a short term solution to the immediate issue posed by Xoserve's systems. However, we have a couple of concerns that we would like to be addressed prior to the modification becoming implemented.

### Implementation:

N/a

### Impacts and Costs:

N/a

### Legal Text:

N/a

### Are there any errors or omissions in this Modification that you think should be taken into account?

Business rule 4, as is noted within the modification report, needs clarifying: we would like the methodology for being able to nominate a specific read from the batch that we provide to Xoseve to be set out more clearly. This clearer methodology should note formats and timescales.

In regards to business rule 5, as is noted within the modification report, we would also like to place timescales on this modification. As this modification will restrict the amount of Class 3 supplies available to each Shipper, and, as smart meters are continually

being installed, the number of meters viable for Class 3 settlement will inevitably increase. To negate this modification becoming a permanent fixture of the code, we, therefore, propose that the restriction on the number of meters that you can switch over to Class 3 is set to a maximum of 6-month timeframe. This timeframe will provide Xoserve with enough leeway to be able to increase total settlement capacity.

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

N/A