

Representation - Draft Modification Report UNC 0664

Transfer of Sites with Low Read Submission Performance from Class 2 and 3 into Class 4

Responses invited by: **5pm on 19 March 2020**

To: enquiries@gasgovernance.co.uk

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

Representative:	Alison Price
Organisation:	Npower Group
Date of Representation:	19/03/20
Support or oppose implementation?	Oppose
Relevant Objective:	d) Positive

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

Npower understand the benefits for this change but oppose the change due to the impacts to our I&C customer; from a customer point of view we think the negatives outweigh the benefits being proposed.

This month we have experienced issues (which are still on-going) whereby Xoserve are impacting the read performance for Class 2 sites due to issues on their side with the gateway. If this happened for a prolonged period of time, we could see sites forced into a Class 4 through no fault of our own, so reassurance is needed as to how sites impacted by this would be treated.

We are also concerned regarding the impacts moving sites may create downstream, for example, if Class 2 sites not being able to control their Supply Offtake Quantity (SOQ) when moved into Class 4 which from a customer point of view isn't what they require.

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

If the change were to be approved, then we would require more than 6 months to make the relevant system changes.

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

We would need to consult with our third parties to understand the development costs, but costs would be significant compared to the benefits for the solution.

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

No comment

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

Q1: Consider whether proposal has an impact on Shippers who ship for other parties?

No comment

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.*

No comment

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

No comment