

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:	David Morley
Organisation:	OVO Energy/OVO (S) Gas Limited
Date of Representation:	19/03/2020
Support or oppose implementation?	Oppose
Relevant Objective:	d) None

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

We can understand the rationale for this modification, as this could potentially lead to the negating the misuse of the favourable UIG weighting factors that are allocated to Classes 2 and 3, and we are supportive in principle. However, we do not believe that the proposed solution is the most efficient way to address Shipper shortcomings.

The commentary within the Mod Report sets out “obtaining of Valid Readings from Supply Meters at Supply Points in these settlement classes does not improve the situation regarding temporary UIG but hinders it further.” There is no demonstrable evidence presented within this Modification of the difference this proposed approach will make to the UIG situation, aside from narrative it seems.

We can see that there is a potential consideration that the solution indicates “overengineering”, noting it has fairly significant costs associated with the implementation within the CDSPs systems without a clear indication of benefits realisation.

A further point of clarification we would like to draw out is the content in the Mod consultation does not seem to address how Shippers would manage the Lock-down period, where it is moving from being able to re-register classes within 2 months (current process) to 3 months.

Noting this could include manual intervention and monitoring – that addressing this scenario could contribute to additional costs in the implementation.

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

N/a

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

N/a

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

N/a

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?

N/a

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.*

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

N/a