Joint Office of Gas Transporters

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:	Claire Roberts
Organisation:	ScottishPower
Date of Representation:	19 March 2020
Support or oppose implementation?	Support
Relevant Objective:	**d)** Positive

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

SP agree with the principle of the modification and its relevant objective. Shippers should only benefit from having sites in class 2 and 3 when they are meeting read performance as per the current UNC rules.

However, we are not clear on how this modification benefits UIG in the short or even medium term. By giving the CDSP powers to move sites into class 4 it doesn't necessarily translate to shippers improving their performance. Some shippers may take immediate action to have the supply point reclassified as Class 2 or 3 or again accept the supply meter points have moved back and continue to perform poorly in PC4.

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

6 months lead time would be required to allow for system changes that are yet to be defined as part of XRN4990.

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

We are not able to quantify development and ongoing costs at present as XRN4990 is not fully developed and is at "initial review stage".

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

No Comment

Joint Office of Gas Transporters

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.*

Both the MOD & XRN should be aligned together for delivery.

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

No Comment