

Representation - Draft Modification Report UNC 0664VVS

Transfer of Sites with Low Valid Meter Reading Submission Performance from Classes 2 and 3 into Class 4

Responses invited by: **5pm on 01 July 2021**

To: enquiries@gasgovernance.co.uk

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

Representative:	Oorlagh Chapman
Organisation:	Centrica
Date of Representation:	1 st July 2021
Support or oppose implementation?	Qualified Support
Relevant Objective:	d) Negative

The consultation is aimed at establishing if the content/effect of the variation have caused you to change a view that you previously expressed, or to take a view that you had not previously considered. Please note any representation received in respect of Modifications 0664 and 0664V will be carried forward should parties not wish to change their original representation.

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

We agree with the principle of the modification, however we do not believe the solution encourages or improves performance.

We believe the associated cost and effort required to deliver the solution within both the CDSPs systems and the substantial changes to our internal processes outweigh the potential, yet undefined, benefits.

The original modification sought to propose additional incentives to bring about better performance, however the final modification does not achieve this end. Although we in principle support the intent of the proposal however, the solution also fails to consider the volume of error/energy or improve the accuracy of settlement.

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

A minimum of 6 months lead time would be required to allow for any system change that may be identified

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

To be confirmed

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

No further comments

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

Q1: Please provide your views on, and confirmation of, the Self-Governance status.

We believe the modification meets the Self-Governance status

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 further comments

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

No comment