

## 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](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Claire Louise Roberts
<b>Organisation:</b>	ScottishPower
<b>Date of Representation:</b>	01 July 2021
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	d) Positive

*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: Please summarise (in one paragraph) the key reason(s)

ScottishPower agrees with the principle of the modification and its relevant objective. If this modification is implemented, it would ensure Supply Points are in the appropriate Product Class and match their ability to provide meter reads into settlement as per the UNC rules. Shippers should not benefit from a lower UIG share where a Supply meter point is under performing.

We would like to note the 25% low performance threshold that has been set recognises the value of having more accurate reads being entered into settlement.

Within the modification it states the CDSP will set the charging rates and invoice arrangements, we would like early view of what these expected charges are likely to be.

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

Should this modification be approved, 6 months lead time would be required to allow for any system changes that are yet to be defined as part of XRN4990.

As part of cross code working we would like to see both IGT & UNC modifications delivered at the same time.

#### 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 "capture stage".

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

Yes

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

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

Agree with the self-governance status

**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 comment

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

No further comment