

Representation - Draft Modification Report UNC 0711S

Update of AUG Table to reflect new EUC bands

Responses invited by: **5pm on 12 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:	12/03/2020
Support or oppose implementation?	Oppose
Relevant Objective:	d) Positive

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

We support the intent of this change however we have some concerns regarding the solution:

The EUC a MPRN is allocated to, is based on the Market Sector Flag which is submitted by the shipper. This field is not mandatory or validated. Unless there are some controls put around this data field as part of this mod, having UiG factors at this level could open up the market to potential risk of shippers using this to avoid UiG, i.e. if the UiG factors are less for I&C then what is to stop shippers falsely entering their portfolio as I&C and not domestic to avoid UiG? Whilst we believe this is unlikely to happen, it is still a risk, which this solution doesn't mitigate.

The quality of data used to determine said factors for the new EUCs by AUGE. Given there is insufficient data for the profiles to be created for PP in some categories by DESC, the industry would need to be confident around the data that AUGE would use to produce the factors ahead of it being implemented with some form of formal review/sign off. Previously the data that AGUE used re: theft, which drove the big move to the class 4 weighting was challenged after the factors were implemented.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

We agree that this qualifies for self-governance

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

If agreed, we are fine with the implementation date suggested.

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

No significant costs identified at this stage.

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

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.