

Representation - Draft Modification Report UNC 0654 Mandating the provision of NDM sample data

Responses invited by: **5pm on 07 September 2018**

To: enquiries@gasgovernance.co.uk

Representative:	Lorna Lewin
Organisation:	Orsted
Date of Representation:	24 August 2018
Support or oppose implementation?	Support
Relevant Objective:	d) Positive f) Positive

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

We support the mandating of NDM sample data as we believe it will bring benefits to the developments of EUCs and demand modelling. This will lead to improvements in the NGM algorithm, which in turn will help to bring improvements to the UIG issues.

Self-Governance Statement: Please provide your views on the self-governance statement. In particular do you consider the Modification is suitable for Self-Governance?

As the modification is a request for data and reporting by PAC, we support it being self-governance.

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

Sufficient time should be given to allow affected parties to make arrangements for the provision of the data in the format specified. At a minimum we would expect 3 months development time.

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

We have not fully analysed the costs.

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

Yes

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

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

The timelines are too tight to submit the data by the 5th business day of the month. Shippers may not have enough time to process reads particularly during bank holidays which may affect timely submission. We would like to see the window for submission extended.