

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

<b>Representative:</b>	Carl Whitehouse
<b>Organisation:</b>	First Utility
<b>Date of Representation:</b>	7 September 2018
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	d) Positive f) Positive

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

The provision of NDM sample data was identified as having a positive effect on the modelling of demand at the Demand Estimation Sub Committee (DESC) and thus having a positive effect on levels of Unidentified Gas. We fully support any such initiatives that can bring more certainty to the NDM algorithm and profile Unidentified Gas accurately.

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

We believe this proposal can proceed under self-governance.

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

We believe 3 months is a suitable timeframe for implementation.

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

There will be minimal costs associated with this change.

#### 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**