

Representation - Draft Modification Report UNC 0819 Establishing/Amending a Gas Vacant Site Process

Responses invited by: **5pm on 16 November 2023**

To: enquiries@gasgovernance.co.uk

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

Representative:	Colin Paine
Organisation:	ENGIE
Date of Representation:	16 November 2023
Support or oppose implementation?	Support
Relevant Objective:	d) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

We are supportive of this modification for the following reasons:

- It will promote better competition between Shippers by removing the current situation where some Shippers with high numbers of vacant sites that have no remote metering present continue to incur transportation charges, as reads cannot be obtained to adjust AQs to a *de minimis* level, whereas other Shippers with fewer of these sites will not see the same impact
- It will improve the fairness of the Performance Assurance Framework by ensuring that Shipper performance is not negatively impacted simply due to portfolio make-up where a Shipper has a large number of vacant sites
- It would align treatment of vacant sites in the gas industry with the established approach for such sites in the electricity industry

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

We note the aspiration to implement this in the November 2024 release and accept that due to the need to develop reporting and potentially changes to UK Link or CMS to implement the solution there will be a significant lead time. We do however view this as an important and beneficial change and would hope that the timetable would not slip beyond this.

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

Aside from our funding share of the costs of the change at industry level, we would not see significant implementation costs, these would mainly be testing the changes to systems required and training staff on the new process for declaring vacant sites. Once established as vacant and remaining in that state, there would be a cost and efficiency benefit as these sites would cease to be included in settlement remediation work and allow resource to be focused on sites where reads can be obtained.

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

We have not reviewed the legal text.

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