

Representation - Draft Modification Report UNC 0681S

Improvements to the quality of the Conversion Factor values held on the Supply Point Register

Responses invited by: **5pm on 11 July 2019**

To: enquiries@gasgovernance.co.uk

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

Representative:	John Cooper
Organisation:	BUUK
Date of Representation:	01/07/2019
Support or oppose implementation?	Support
Relevant Objective:	d) Positive f) Positive

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

BUUK support the implementation of this modification. It is clear that it meets both of the relevant objectives outlined above – facilitating competition through having more accurate costings and promoting efficiency across the industry. It is noted however, the IGT UNC equivalent modification has been determined as not necessary. The IGT UNC legal text already points across to the proposed UNC text at a high enough level.

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

Agree.

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

None envisaged.

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

The costs to IGTs are envisaged to be minimal, largely due to the low number of sites close to the threshold. It is also difficult to say whether this would have a negative or positive impact. In terms of development costs, this should be minimal to none.

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

Yes, satisfied with the legal text presented.

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.*

None to note.

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

No additional analysis provided.