

Representation - Draft Modification Report UNC 0648S
End dating the revised DM Read estimation process introduced by
Modification 0634

Responses invited by: **5pm on 27 April 2018**

To: enquiries@gasgovernance.co.uk

Representative:	Mark Rixon
Organisation:	ENGIE
Date of Representation:	
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

The current process (put in place because of Modification 634) doesn't appear that effective based on historical data to date. The clear majority of the zero estimate readings were either left unchanged or updated with a value nominated by the shipper. (Rather than a default AQ/365 being imposed.) Therefore, the overall positive impact of the new process seems to be minimal.

The new process is more complex with subjective interventions by third parties who don't have a direct financial exposure to inaccurate DM readings.

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

No Comment

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

As soon as possible.

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

No Comment

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