

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:	Edward Ewan Fyfe
Organisation:	Scotland Gas Networks and Southern Gas Networks
Date of Representation:	07/09/2018
Support or oppose implementation?	Support
Relevant Objective:	d) Positive f) Positive

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

In mandating the provision of NDM sample data, SGN agree that the proposal would help facilitate greater degrees of accuracy in modelling. This would go some way to tackling the decreasing amount of data which is currently being provided.

The data that is presented in forums to the Industry and to Ofgem may suffer from being less accurate than it could be without the adoption of this Modification.

This modification should support more accuracy in the gas allocation process which in turn should help reduce the size of the UIG pot. No matter how small, anything that can help with the fluctuations in UIG since Project Nexus would be welcome.

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 agree with the Self-Governance Statement within the modification that this is a non-material change.

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

Engaged stakeholders will need time to originate and evolve reporting into an agreed format. A minimum lead time of 3 months is recommended for this development.

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

No SGN costs or system development has been identified

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

Legal Text provided by SGN

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 identified.

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

None to add.