

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:	Mark Rixon
Organisation:	ENGIE
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)

Agree that additional sample sites are required to derive robust statistical estimates of the NDM parameters for each EUC. Shippers should be obligated to support this process, by providing sample data representative of their individual portfolios.

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

Agree.

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

Three months would allow shippers the necessary time to implement the necessary processes.

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

No Analysis undertaken on this.

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

No comments.

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

None.