

Representation - Draft Modification Report UNC 0664

Transfer of Sites with Low Read Submission Performance from Class 2 and 3 into Class 4

Responses invited by: **5pm on 19 March 2020**

To: enquiries@gasgovernance.co.uk

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

Representative:	Andrew Green
Organisation:	Total Gas & Power Ltd
Date of Representation:	19/03/20
Support or oppose implementation?	Comments
Relevant Objective:	d) Positive

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

We are fully behind the concept of increased read submission to improve settlement accuracy and UIG allocation. The industry should always strive to submit as many reads into settlement as possible and these should be in the required timeframe for the settlement product class.

We are aware that AMR and smart meters can have connectivity and reliability issues and there is also a risk around DCC operational performance. Operational issues on specific meters can take time to be resolved and in small portfolios this can significantly affect aggregate portfolio performance, which means this modification could adversely affect small shippers more than larger shippers. We understand that a balance needs to be taken and we should not be giving UIG benefit to those who are actively seeking benefit from moving between read classes and not making any attempt to meet the read performance levels. We see this modification as having the right intentions but that it is a compromise and does not provide the perfect solution.

There is a concern that some sites with genuine issues that can be resolved and therefore will perform well may be moved into SPC4 and not allowed back which would reduce the number of reads into settlement which is against the best practice for the industry.

In summary we support the intention of the modification but think it requires further development at workgroup.

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

In accordance with industry recommendations

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

We would face BAU operational costs of minor significance and potentially some customer contractual impacts

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

We have not reviewed the Legal Text

Modification Panel Members have requested that the following questions are addressed:

Q1: Consider whether proposal has an impact on Shippers who ship for other parties?

TGP does not ship for other parties

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.*

We have not identified any omissions or errors in the Modification Report

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

None provided