

Representation – Modification UNC 0700 (Urgent)

Enabling large scale utilisation of Class 3

Responses invited by: **5pm on 07 August 2019**

To: enquiries@gasgovernance.co.uk

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

Representative:	Kirsty Dudley
Organisation:	E.ON
Date of Representation:	06/08/2019
Support or oppose implementation?	Qualified Support
Relevant Objective:	f) Positive

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

We support of the intent of this modification and recognise the need for a solution to be deployed because in the absence of this modification the UK Link systems could fail.

We are concerned that a full and final design solution is not fully developed and at this time it is only perceived this will resolve the issue. We require a clearer methodology for the formats and timescales.

The introduction of a staging table to control EUC 01 reading loaded into UK Link provides sensible interim solution which will mitigate the possibly of central read systems failing.

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

As outlined within this modification, the anticipated uplift in MPRN's participating in product class 3 is expected in gas charging 2019/20, so we feel that this should be implemented as soon as practically possible. It requires to have post implementation review to ensure that any unintended consequences are identified as soon as possible.

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

We anticipate minimal development costs and impacts for both development and ongoing costs if this modification is approved.

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

We are unable to comment as the legal text has not been released at the time of this response.

Are there any errors or omissions in this Modification 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

At the time of our response no equivalent IGT UNC modification had been raised and without legal text it is difficult to determine there is no IGT UNC impact.