Representation - Modification UNC 0723 (Urgent)

Use of the Isolation Flag to identify sites with abnormal load reduction during COVID-19 period

Responses invited by: 1pm on 27 April 2020

To: enquiries@gasgovernance.co.uk

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

Representative:	Rebecca Louth
Organisation:	ENGIE
Date of Representation:	27/04/2020
Support or oppose implementation?	Support
Relevant Objective:	**a)** Positive* *delete as appropriate* **d)** None* *delete as appropriate*

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

ENGIE is supportive of this modification as part of the general effort to address the COVID-19 impact on the gas industry but feel it is not without risk.

The isolation process is meant to involve a physical disconnection of the meter and using it administratively to remove zero consuming sites out of settlement due to COVID-19 will create uncertainty, especially after changes of supply, as to whether these sites are truly isolated or not. This could create potential safety issues. This risk should be reviewed if the modification is approved and controls put in place if needed.

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

As soon as possible after a suitable risk assessment.

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

This modification might create uncertainty as to the isolation status of sites and raises potential safety concerns, these should be addressed prior to implementation.

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

Yes

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.*

N/A

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

N/A