

Representation - Draft Modification Report UNC 0690S

Reduce qualifying period for Class 1

Responses invited by: **5pm on 24 January 2020**

To: enquiries@gasgovernance.co.uk

Representative:	James Jackson
Organisation:	Sembcorp Energy UK
Date of Representation:	24/01/2020
Support or oppose implementation?	Qualified Support
Relevant Objective:	<p>a) None</p> <p>b) None</p> <p>d) None</p>

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

Although we agree with the rationale and purpose of the modification, we believe the suggested arrangements should be limited to Class 3 and 4 meter points transitioning to Class 1 (Non-Daily Metered (NDM) to Daily Metered (DM)). We do not see the inclusion of Class 2 meter points as necessary, given they are already subject to DM arrangements.

We appreciate the workgroup view that the inclusion of Class 2 acts as a failsafe. However, we feel there would be greater benefit in encouraging sites to move into Class 2 rather than away, in order to improve allocation accuracy and reduce UIG.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

Yes, we agree that the change should follow Self-Governance procedures.

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

The lead-time on implementation should take the practicality of the modification proposal into account. The move to DM necessitates the installation of equipment and systems. Relevant parties should therefore ensure that the required processes are in place to implement the modification for their portfolios.

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

N/A

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

N/A

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