

Representation - Modification UNC 0722 (Urgent)

Allow Users to submit Estimated Meter Reading during COVID-19

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:	Gareth Evans
Organisation:	ICoSS
Date of Representation:	27 April 2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

We agree with the proposer's view that many sites' are not being reconciled owing to difficulties in obtaining meter readings as a result of the COVID-19 pandemic. A process is therefore needed to allow shippers to submit reasonable estimates to allow reconciliations to occur and so improve cost allocation.

The solution provided allows that to be done quickly and effectively by utilising existing processes. We accept the need of keep records of shipper calculations to ensure future scrutiny.

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

Owing to the continuing problem of large numbers of sites being unreconciled this change needs to be implemented as soon as possible.

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

Shippers will need to develop processes to calculate appropriate estimated meter readings and keep records if they wish to utilise this process.

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

We have reviewed the legal text and have not indicated any concerns with the drafting.

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.*

None identified.

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

None provided.