

Representation - Draft Modification Report UNC 0691S

CDSP to convert Class 2, 3 or 4 meter points to Class 1 when G1.6.15 criteria are met

Responses invited by: **5pm on 07 August 2020**

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:	05/08/2020
Support or oppose implementation?	Support
Relevant Objective:	a) Positive d) None

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

E.ON supports this modification as we agree that it will incentivise Shippers to accelerate the movement of qualifying sites into class 1 where they qualify.

This will have benefits of increasing read submissions, improving daily allocation, meter point reconciliation and Unidentified Gas (UIG) calculations. We also support the inclusion of new PAC reports in the PARR as this will provide awareness for Shippers ensuring that the PAC can give appropriate consideration to compliance, for example Shippers who consistently default when G1.6.15 criteria is met.

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

We support Self-Governance procedures as we do not believe that the proposal causes material impacts to new consumers but instead seeks to enforce existing rules in the UNC when sites are class 1.

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

We believe that Shippers will have system impacts as a consequence of this change, therefore we believe implementation should be in line (and no earlier than) XRN 5038 implementation. This should also be aligned to a major release.

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

We anticipate some costs are required for this modification but are not anticipated to be large scale, a more detailed assessment is expected through the development of XRN 5038.

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

For information: legal text for UNC Modification 0691S has been provided with UNC Modification 0708S legal text in mind. It is recommended therefore that UNC Modification 0691S legal text, if approved, is inserted into the Uniform Network Code after the UNC Modification 0708S effective date (as aligned with IGT137 timescales) of 05:00 on 24 July 2020.

No comments on the legal text as the refined text stops the need for an IGT UNC modification which we support, and the text needed to incorporate the implementation of 0708.

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.*

No Comments

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

No comments