

Representation - Draft Modification Report UNC 0711S

Update of AUG Table to reflect new EUC bands

Responses invited by: 5pm on 12 March 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:	10/03/2020
Support or oppose implementation?	Oppose
Relevant Objective:	d) Positive

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

We support the intent of the change to ensure information to the AUGE aligns to the updated EUCs, we however do not support the cost as the ROM (XRN 5068) is far greater than we expected. There doesn't appear to be a clearly outlined benefits case which demonstrates that it will deliver any benefits at all for the investment given. It is essentially a template change but due to system design it is a lot more costly.

We do not believe that the granular information in the refreshed reporting will be any more influential to the amalgamated EUC reporting utilised by the AUGE today.

We have concerns that the AUGE methodology is not robust, although we recognise this is not part of the intent of this modification, but we do believe it is linked. If the EUC data changes influence the methodology and there has not been any test runs to confirm that the data does not have any detrimental impact. We are concerned that the investment of this change may see the exact same output as the AUGE review completed in 2019.

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

This would qualify for self-governance as it is only a reporting change.

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

If approved, we would be comfortable for the dates outlined in the modification.

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

There would be limited implementation costs for us.

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

No comments.

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.*

NA.

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

NA