

Representation - Draft Modification Report UNC 0819 Establishing/Amending a Gas Vacant Site Process

Responses invited by: **5pm on 16 November 2023**

To: enquiries@gasgovernance.co.uk

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

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|---|---|
| Representative: | David Mitchell |
| Organisation: | Scotland Gas Networks Ltd and Southern Gas Networks Ltd |
| Date of Representation: | 16 th November 2023 |
| Support or oppose implementation? | Comments |
| Relevant Objective: | d) Positive |
| Relevant Charging Methodology Objective: | Not Applicable* <i>delete as appropriate</i> |

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

SGN would like to provide the following comments in this consultation that we feel are important for the proposer to consider and ultimately develop with the PAFA and the PAC so that this proposal can be delivered successfully.

This modification proposes that once a supply point has met the vacant criteria the shipper will be able to instruct the CDSP to remove the settlement obligations that it has which will curtail transportation costs while the vacant site criteria is met. The process that this modification will introduce will treat dumb metered supply points in the same way as Smart and AMR supply points when a site becomes vacant.

We would like to highlight that this modification will be reliant on the PAFA and the PAC introducing robust monitoring of the vacant sites so that the process is discharged correctly. We believe that without the necessary monitoring in place there is a risk that a site could appear vacant when it is not so this is an area that must have careful consideration to give industry parties the appropriate confidence in the process to avoid any unintended negative consequences to other related processes such as settlement.

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

The modification should be implemented as soon as possible following an authority decision subject to any necessary central system updates.

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

SGN does not envisage any development costs or ongoing cost to its internal systems.

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

We are satisfied with the legal text.

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 identified.