

## Representation - Draft Modification Report UNC 0652

### Introduction of winter read/consumption reports and associated obligations

Responses invited by: **5pm on 14 March 2019**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Paul Bedford
<b>Organisation:</b>	Opus Energy Limited
<b>Date of Representation:</b>	13/03/19
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	d) Positive

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

We are supportive of this proposed modification because the current assigned default Winter Annual Ratio is adversely impacting levels of Unidentified gas (UIG). This proposal should reduce levels of UIG.

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

A 6 month lead time is requested as this is a commonly recognised minimum timescale amongst some Industry Codes.

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

Some additional costs would be incurred (full internal analysis not yet completed) but the benefits to reduced levels of UIG would justify this.

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

Yes

**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

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

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