

## Representation - Draft Modification Report UNC 0654

### Mandating the provision of NDM sample data

Responses invited by: **5pm on 07 September 2018**

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

<b>Representative:</b>	John Welch
<b>Organisation:</b>	npower
<b>Date of Representation:</b>	07/09/2018
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	d) Positive f) Positive

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

We support the mandatory provision of NDM sample data, to increase the amount of data available for demand estimation modelling. We believe this should ultimately have a positive impact on demand estimation.

#### Self-Governance Statement: *Please provide your views on the self-governance statement. In particular do you consider the Modification is suitable for Self-Governance?*

We agree with the existing modification categorisation. While there is a good argument for self-governance status, given that there could be an eventual material impact on cost allocation, on balance we believe authority direction procedures should apply.

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

We would prefer an implementation lead time of six months to allow parties to make the necessary changes to systems to retrieve and send the relevant data.

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

Not yet fully quantified.

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

We have not reviewed 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**

We agree with the need to send data in a timely fashion, but note the requirement for submission of data on the 5<sup>th</sup> business day could pose some challenges in certain situations (when retrieving data for the last days of the previous month/period). We would hope for flexible common sense working arrangements around these timescales in such situations (bank holidays etc.).