

Representation - Modification UNC 0722 (Urgent)

Allow Users to submit Estimated Meter Reading during COVID-19

Responses invited by: **1pm on 27 April 2020**

To: enquiries@gasgovernance.co.uk

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

Representative:	Paul Youngman
Organisation:	Drax
Date of Representation:	27/04/2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

Reason for support

Due to COVID-19 lockdown, there is an increased likelihood of failure to obtain accurate reads due to unavailability of meter readers, restricted access to meters due to closed premises and limited opportunity to take corrective measures with respect to faulty AMR meters.

Lockdown has also impacted gas usage, including actual usage deviating significantly, either up or down, from the AQ.

We therefore support this proposal that Users are permitted to submit estimated Meter Readings for Non-Daily Metered Class 3 and 4 Supply Meter Points during the COVID-19 pandemic because Shippers require a mechanism to ensure that sites that are currently inaccessible can register an estimated reading that is more representative of actual consumption. This will avoid the material impacts of incorrect allocation based on AQs that are no longer representative of consumption. We believe this proposal is positive for Relevant Objective (d).

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

This change has been granted urgent status due to the unprecedented impacts of COVID-19. Given the urgency, the proposed solution has necessitated one that has no system impacts and required process updates, and so could effectively be implemented immediately following approval.

We are conscious that the development of this proposal has been rapid with little opportunity for industry to analyse all potential consequential impacts that may need to be mitigated. For instance, there has been no opportunity to understand how the provisions would operate if parts of GB (e.g. geographic regions or specific industries) were still under COVID measures or COVID measures currently in force were lifted and then reinstated under the same powers.

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

Process impacts only.

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

Legal text requires definition of the Relevant Period that UNC 722 would apply from and when it would end. It is unclear at what stage/trigger, other than the end of the Government's COVID-19 provisions would necessitate removal of this section from the Code.

We agree that Shippers should be required to maintain a record of the basis on which estimates have been calculated for a period of two years following the end of the Relevant Period.

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.*

The PAB may need to establish working groups to ensure that any potential unintended consequences of this temporary solution are mitigated.

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

No further comment.