

## Representation - Draft Modification Report UNC 0672

### Target, Measure & Report Product Class 4 Read Performance

Responses invited by: **5pm on 15 May 2020**

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

<b>Representative:</b>	Claire Roberts
<b>Organisation:</b>	ScottishPower
<b>Date of Representation:</b>	12 <sup>th</sup> May 2020
<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)**

ScottishPower supports this change as it seeks to reduce Unidentified Gas (UIG) volume by providing a target for read submission against a Shippers overall Product Class 4 portfolio. This will mitigate the risk of a Shipper meeting their current read obligation but not reading their larger sites which have the potential to contribute more to UIG.

Providing PAC with an un-anonymised report will allow them to target Shippers who are potentially contributing more to UIG with higher consuming sites

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

No lead time required, this will be as directed by panel approval

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

None identified at present

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

Yes

**Modification Panel Members have requested that the following questions are addressed:**

*Q1: Views are requested on whether this Modification should be the subject of Self-Governance or Authority Direction?*

This modification should be subject to self-governance as it should not result in financial impact for Shippers.

**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

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

N/A