

Representation - Draft Modification Report UNC 0681S

Improvements to the quality of the Conversion Factor values held on the Supply Point Register

Responses invited by: **5pm on 11 July 2019**

To: enquiries@gasgovernance.co.uk

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

Representative:	Gareth Evans
Organisation:	ICoSS
Date of Representation:	11/07/2019
Support or oppose implementation?	Oppose
Relevant Objective:	<p>b) Negative</p> <p>d) Negative</p>

Reason for support/opposition:

We agree with the proposer of the modification that improvement of the conversion factor data item on the supply point register will have a reductive effect on UIG because of the improvements it will make to measured energy. We do, however have some lingering concerns about the solution. Principally, we disagree that when the AQ of a given site falls below 732,000 kWh that the CF should revert to a default value as this would make any subsequent energy calculation less accurate.

We also would draw attention to the fact that sites with volume converters installed and a site-specific conversion factor that also have an AQ lower than 732,000 will lose their unique conversion factor under this proposal which will cause problems (and potentially negatively impact UIG) should their converters fail.

We are also disappointed that sites that have never had a site-specific conversion factor calculated are out of scope for this change leaving them still generating UIG.

We would support a modification that only sought to correct meter points whose AQ is greater than 732,000 kWh and require a bespoke conversion factor.

Self-Governance Statement:

We disagree that self-governance is appropriate.

Implementation:

We would expect that sufficient time be given to ensure awareness of the change and subsequent implications, and readiness among industry parties.

Impacts and Costs:

We have not identified any costs associated to this modification.

Legal Text:

We have no comments with regards to the legal text.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

As stated previously, we would draw attention to the fact that sites with volume converters installed and a site-specific conversion factor that also have an AQ lower than 732,000 will lose their unique conversion factor under this proposal which will cause problems (and potentially negatively impact UIG) should their converters fail.

We have additional concerns about sites that have an AQ that would mean frequent transition across the 732,000 AQ threshold and the impact that this would have on billing these customers, and the amount they are charged should the CF change needlessly to a less accurate one.

We are also disappointed that sites that have never had a site-specific conversion factor calculated are out of scope for this change leaving them still generating UIG.