

Representation – Modification UNC 0634 (Urgent)

Revised estimation process for DM sites with D-7 zero consumption

Responses invited by: **5pm on 03 November 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Maitrayee Bhowmick-Jewkes
Organisation:	Npower Ltd
Date of Representation:	03/11/17
Support or oppose implementation?	Oppose
Relevant Objective:	d) None

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

While we support the numerous initiatives to improve issues relating to UiG, and in theory, improving current problems with DM estimates makes sense, we oppose this modification for two reasons.

The urgent status given to the modification did not allow thorough industry development of the proposal. This left some of the areas such as the suitability of using AQs, clear and well understood business rules, underdeveloped. Furthermore, given the focus that Xoserve have shown in this area, and some debate on the full materiality of the specific issue, it is not clear how much benefit would be offered through implementation of the proposal.

In general, as stated, we support the work that is ongoing to resolve UiG issues, and appreciate that in some areas swift action may be required, but is still important that any industry proposals are thoughtfully developed with risks and benefits well debated and understood.

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

N/A

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

N/a

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

N/A

Are there any errors or omissions in this Modification 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

None