

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:	Sasha Pearce
Organisation:	Npower
Date of Representation:	27/04/2020
Support or oppose implementation?	Oppose
Relevant Objective:	d) Negative

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

We understand the intent of this Modification is to ensure that shippers have a mechanism for estimating consumption at sites where there have been changes in usage as a result of COVID-19. However we have a number of concerns about this proposal:

How can accuracy of estimation and consistency across shippers be ensured? Will a blanket x% reduction be made and will estimation happen at a site level based on customer provided information?

Would these reads need to be flagged so they were not used in future post covid19 or post Lockdown AQ calculations or how will they be considered?

We consider that submitting estimates now will lead to a whole host of problems as the reads will be based on the current AQ when many sites are on lockdown and could have reduced consumption. That will potentially cause negative consumption rejections on actual reads when these start up again.

We do not consider that this Modification facilitates the UNC Objectives, as it will introduce a lack of control and visibility of reads submitted.

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

No lead time required – if, approved implementation could immediately follow approval.

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

No significant implementation costs.

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

No comments

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.*

No comments

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

None