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27th April 2020

Your Reference: UNC Modification Proposal 0722(Urgent)

UNC Modification Proposal 0722(Urgent) - Allow Users to submit Estimated Meter Reading during COVID-19

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal which Cadent would like to support.

Do you support or oppose implementation?

Support

Relevant Objective:

d) Positive

Reason for support/opposition:

This modification, if implemented will allow Shippers, during the Covid-19 transitional period, to submit Estimated Meter Readings for Class 3 and 4 Supply Points where an Actual Meter Reading cannot be procured.

We understand and support the rationale behind this modification. That said we also note, that due to the urgency of the modification, it doesn't address (or require) any future 'unpicking' of the Estimated Meter Readings once Actual Meter Readings for the relevant period are procured.

We note the modification does though require Shippers to keep a record of how Estimated Meter Readings were derived. We would welcome a solution that requires the Shipper to use these records at a future date to retrospectively amend the Meter Readings where an Actual Meter Reading becomes available.

Implementation

Implementation of the modification could occur immediately following approval by the Authority.

Impacts and Costs

None identified.

Legal Text

We are satisfied that the Legal Text meets the intent of the modification.

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

We have not identified any errors or omissions.

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

Nothing further to add.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 07884 113385 (andy.clasper@cadentgas.com) should you require any further information.

Yours sincerely,

Andy Clasper