

Representation - Modification UNC 0721 (Urgent)

Shipper submitted AQ Corrections 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:	Lorna Lewin
Organisation:	Orsted
Date of Representation:	27 April 2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

The restrictions imposed by the government due to COVID-19 pandemic has resulted in many businesses having to shut down. As the proposer has accurately identified, many of these sites' AQs are erroneously high and a process is urgently needed to re-align the AQ to their expected consumption to improve settlement accuracy.

The solution within this modification allows this to be done quickly and effectively utilising existing UK Link system functionality and processes. We support the need of manage the potential number of AQ corrections by restricting this process to EUC Bands 2-9.

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

We would like to see this change implemented as soon as possible due to the negative impact of inaccurate AQs on the market. We recognise that as the modification proposes to utilise existing system functionality and processes that any new AQs will not become effective until 1 June.

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

We have not fully assessed the impacts and costs to our business, but expect these to be minimal.

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

Yes

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 identified.

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