

## Representation - Modification UNC 0723 (Urgent)

### Use of the Isolation Flag to identify sites with abnormal load reduction during COVID-19 period

Responses invited by: **1pm on 27 April 2020**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Gareth Evans
<b>Organisation:</b>	ICoSS
<b>Date of Representation:</b>	27 April 2020
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	a) Positive d) Positive

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

We agree with the proposer's view that many sites' not consuming gas as a result of the COVID-19 pandemic are being allocated gas through the settlement regime. This is creating significant errors in gas settlement, as evidenced by the large UIG numbers currently being witnessed. A process is therefore needed to remove vacant sites from the settlement process. The solution proposed allows that to be done quickly and effectively by utilising existing processes.

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

Owing to the continuing problem of large numbers of sites being allocated gas consumption when vacant, this change needs to be implemented as soon as possible.

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

Shippers will need to develop processes to identify sites that need to be flagged as "Isolated" and submit those requests, as well as provide suitable justification, if they wish to utilise this process.

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

We have reviewed the legal text and have not indicated any concerns with the drafting.

**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**

ICoSS has been tracking the impact on the market from the COVID-19 pandemic and there has been an overall reduction in business demand of around 20-25%. This demonstrates the need for a quick and effective process to remove vacant sites from the balancing regime.