

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:	Nigel Bradbury
Organisation:	Energy Intensive Users Group
Date of Representation:	27/4/2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

The impact of COVID 19 has created uncertainty in gas demands for many customers. Additional social distancing protocols will cause issues with access to properties for meter reading purposes.

This proposal will allow NDM AQ's to be amended quickly using an existing process which will ultimately help protect the NDM demand attribution. However, more should be done to protect DM customers from fixed/capacity charges.

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

ASAP

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?*

Yes but no DM sites are not protected with this modification.

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.*

The proposed solution will help protect shipper/supplier responsibilities (for meter reading performance), and transporter responsibilities (for protecting the NDM demand attribution and shrinkage processes).

However, more help should be provided in helping DM customers with fixed/capacity charges and ensuring that DM sites do not change load bands (and therefore exposed to higher unit charges in the following charging periods) as an unintended consequence of any changes.

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

Within the current health & economic climate, many DM 'industrial and commercial' consumers have reduced (or completely ceased) their levels of gas consumption due to falling product demands. Many do not know when normal operations will resume.

However, despite no product demand and therefore no income, they are still exposed to the fixed/capacity charges of the charging regime. This mod (or similar) should explore how to offer DM sites temporary relief of the fixed/capacity charges in a similar way that Mod 275 offered protection during the economic crisis in 2008/09.