

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:	Sasha Pearce
Organisation:	Npower Group
Date of Representation:	27/04/2020
Support or oppose implementation?	Comments * <i>delete as appropriate</i>
Relevant Objective:	d) Negative * <i>delete as appropriate</i>

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

We understand the intent of this Modification to address inaccuracy in AQs arising from changes in business activity as a result of COVID-19, however we have concerns about this proposal.

Whilst we agree that facilitating such a process should hopefully lead to more accurate AQs for businesses which might otherwise fail tolerances, more thought needs to be given to the knock-on implications and post-lockdown activities. We are particularly concerned that any corrections made would be in place for a minimum of 9 months which could lead to negative impacts which could not be undone once a site is out of lockdown. We think that it could potentially lead to inaccurate AQ prevailing for months if not years after the COVID crisis is over.

Given these concerns, we do not believe that this Modification will facilitate UNC Objective (d).

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

No lead time required, implementation could follow immediately after approval.

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

None

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

No comments on this.

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.*

We would query the comments regarding justification for urgency – “This means that AQ for many sites in EUC bands 2-9 is significantly overstated, as it is demonstrated by the recent levels of UIG since the commencement of the COVID-19 crisis.” In our view, it is not understood or clear at the moment to what extent the UiG levels are being driven by exceptionally warmer than SN weather over a prolonged period versus being driven COVID-19.

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