

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:	Rebecca Louth
Organisation:	ENGIE
Date of Representation:	27/04/2020
Support or oppose implementation?	Support
Relevant Objective:	None

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

ENGIE supports Modification 0721 as we believe it presents a pragmatic approach to combat the gas allocation issues regarding incorrect AQs resulting from site shutdowns and consumption variations during the COVID-19 crisis.

This modification will allow for MPRNs to be allocated with volumes which more closely represent what is occurring at site.

However, while we support this modification, we would like to understand what can be classed as evidence to support the correction of the AQ (given that it will be difficult or impossible to contact certain customers) and whether there is the ability to use this modification alongside modification 0722.

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?

Impacts surrounding customer communication and understanding what is currently occurring at sites.

Potential operational impacts in developing and sending the corrected AQs.

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.*

N/A

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

N/A