

## Representation

### Draft Modification Report

#### Modification UNC 0722 (Urgent) Allow Users to submit Estimated Meter Reading during COVID-19

1. **Consultation close out date:** 27<sup>th</sup> April 2020
2. **Respond to:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)
3. **Organisation:** Gazprom Energy  
5<sup>th</sup> Floor  
8 First Street  
Manchester  
M15 4RP
4. **Representative:** Steve Mulinganie  
Regulation Manager  
[stevemulinganie@gazprom-mt.com](mailto:stevemulinganie@gazprom-mt.com)  
0799 097 2568 / 0751 799 8178
5. **Date of Representation:** 26<sup>th</sup> April 2020
6. **Do you support or oppose Implementation:**  
We **Support** implementation of our Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**  
We raised the modification to address the fact that many sites are not being reconciled owing to difficulties in obtaining actual meter readings as a result of the COVID-19 pandemic. A process is therefore needed to allow shippers to submit reasonable estimates, as actuals, to allow reconciliations to occur and so improve cost allocation. The solution provided allows that to be done quickly and effectively by utilising existing processes
8. **Are there any new or additional Issues for the Modification Report:**  
No
9. **Self-Governance Statement Do you agree with the status?**  
NA

#### 10. Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

Allowing Shippers to provide Estimated Meter Readings during the COVID-19 pandemic will allow sites to be reconciled and Aqs to be recalculated. This will improve the accuracy of gas allocations and hence cost targeting and so further competition.

#### 11. Impacts & Costs:

*What analysis, development and on-going costs would you face if this modification was implemented?*

We **have not** identified any significant costs associated with this modification

#### 12. Implementation:

*What lead times would you wish to see prior to this modification being implemented, and why?*

Owing to the continuing problem of large numbers of sites being unreconciled this change needs to be implemented as soon as possible.

#### 13. Legal Text:

*Are you satisfied that the legal text will deliver the intent of the modification?*

We have **no** comments on the Legal Text provided.

#### 14. Is there anything further you wish to be taken into account?

*Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or you wish to emphasise.*

No