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ICoSS Response to Allocation of Unidentified Gas (AUG) Process – Request for Feedback 2020

The Industrial & Commercial Shippers & Suppliers (ICoSS) is the trade body representing the majority of the GB non-domestic energy market. Our members¹, who are all independent Suppliers, in total supply in excess of three quarters of the gas and half the electricity provided in the highly competitive non-domestic market.

Overall, we believe as last year that the AUGE **process has worked well this year.**

The current development timeline gives sufficient opportunity for industry parties to examine the proposed AUGE methodology and to engage in a meaningful manner. Regular meetings and updates provide additional information for the industry, gives the AUGE and industry the opportunity to test the underlying methodology and incorporate any improvements into the forthcoming statement, rather than waiting until the next AUGE year.

In terms of the final AUGE statement, we believe that **this year's statement is accurate and robust.** We particularly welcome the continuing emphasis on the theft aspect of Unidentified Gas. We also welcome the stated ambition by the AUGE to **further refine the statement to take account of the evident difference between PPM and credit meters with regard to energy theft**, taking advantage of the new AUGE table.

We consider the AUGE process, and the AUGE statement to be based on a wide and comprehensive range of industry date. We believe that the emphasis going forward should be refining the current AUGE statement and its underlying methodology, rather than seeking to radically alter it.

Gareth Evans





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