

Representation - Draft Modification Report UNC 0664V

Transfer of Sites with Low Read Submission Performance from Class 2 and 3 into Class 4

Responses invited by: **5pm on 12 October 2020**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Claire Roberts
Organisation:	ScottishPower
Date of Representation:	12 th October 2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

The consultation is aimed at establishing if the content/effect of the variation have caused you to change a view that you previously expressed, or to take a view that you had not previously considered. Please note any representation received in respect of Modification 0664 will be carried forward should parties not wish to change their original representation.

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

SP agrees with the principle of the modification and what it seeks to achieve by increasing valid read submission into Class 2 & 3 and striving to deliver benefits into Unidentified Gas allocations through a delivery mechanism which will stop the ability to incorrectly classify supply meter points for a prolonged period.

We agree Shippers should only benefit from having sites classified as Class 2 and Class 3 when the site is meeting read performance as per current UNC rules.

However, we would like to note the points below:

- DCC Issues
- Communication Challenges

If a Shipper fails to meet read performance for a period of three consecutive months the site is to move out of its current Class into Class 4 within 20 business days. The time taken to resolve a communication issue needs to be analysed to understand whether three months is realistic to identify and resolve the fault given the current issues with the DCC and the consumer impact of COVID 19 (i.e. lack of entry to properties).

Is there a window of opportunity for a Shipper to object to the Class Change within the 20 business day rule. There is a concern that some sites with genuine issues that could be resolved may result in being moved to Class 4 for a period of three months when this

could be a timing issue for example a site visit planned just outside of the 20 business days, would there be a grace period if the objection is justified.

Within the Modification it states, "The PAC has confirmed it agreed a 25% target for read performance for 90% of a Shippers Portfolio was suitable as an initial value, recognising this can be reviewed and amended on an annual basis by the PAC".

Can you please clarify if there are no Supply Points that meet the criteria of the 25% but read performance is less than 90% what is the criteria for selecting a Supply meter point is it highest AQ or low read.

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

A minimum of 6 months lead time would be required to allow for any system change that are identified as part of Xoserve XRN4990. Implementation of UNC 0664V, IGT145 and XRN4990 should all be aligned for the implementation date.

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

There will be a cost associated to this change, however we are not able to quantify development and ongoing costs at present as XRN4990 is not fully developed and is at "initial review stage".

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

No Comment

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.*

None Identified

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

No further comments