

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:	Kirsty Dudley
Organisation:	E.ON
Date of Representation:	09/10/2020
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)

E.ON now supports this modification, as it clearly articulates the benefits it will deliver into the UIG allocations across industry, insofar as it stops the ability to incorrectly classify Supply Points for prolonged periods of time.

We believe this will provide the necessary incentives that will ensure Shippers are compliant with read performance measures and prioritising under-performing Supply Points to ensure valid reads are successfully submitted in a timely manner.

We believe the initial performance measurements of 25% of valid readings and 90% of portfolio are fair and achievable, they will ensure those Supply Points that are significantly failing consecutively do not receive the benefits of being class 2 and 3 should the Shipper not take the appropriate actions themselves.

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

We support the 0664V and IGT145 being implemented together with the adequate time for the transitional text to be made available and work with XRN 4990 (aiming for November 2021).

We believe this should be subject to a major release (November 2021) for the system changes to allow for sufficient time and delivery mechanism and for business readiness to implement the system changes and develop internal processes.

We recognise there are reporting elements which can be delivered as part of a minor release and we would be happy to have them deliver separately but that decision should be made at ChMC.

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

We anticipate some system enhancements to ensure and forced class changes are reclassified as well as developing internal processes to ensure compliance and managing exceptions as part of XRN 4990 implementation. To date we have not costed this in detail but believe it to be medium scale costs.

We also recognise there are in-direct impacts to sites that require reclassification incurring additional UIG and transportations costs.

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

No comments.

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.*

The IGT UNC have only recently developed IGT145 to deliver the changes required there, it is required this followed the self-governance route as it is pointing to the UNC changes only. The changes are on separate governance tracks and we want to ensure that the Code Administrators work together for a combined deliver of this change.

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

No comments.