

Representation – Modification UNC 0700 (Urgent)

Enabling large scale utilisation of Class 3

Responses invited by: **5pm on 07 August 2019**

To: enquiries@gasgovernance.co.uk

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

Representative:	Nicola Harris
Organisation:	Utilita
Date of Representation:	06/08/2019
Support or oppose implementation?	Oppose
Relevant Objective:	Negative

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

Unfortunately, this modification places shippers and suppliers in a no-win situation. The proposed changes on how read submission and validation within class 3 functions has a number of fundamental issues which result in Utilita opposing this modification:

1. This modification changes the expected capability of the system which has been in place for 2 years. There are a number key aspects have been omitted from the final process. The major one of these is the lack of a mechanism for Xoserve to tell Shippers about a class change. This means that Shippers have no way of updating their systems to send appropriate reads instead of batched reads.
2. The justification for change has little to no substance. The modification explains the problem but not why this is a sensible solution, nor if any alternatives have been considered, including delivering the system that was initially expected. As a result we have no choice to conclude that there is no cost benefit to customers of Xoserve.
3. The proposed limitations in terms of the amount of sites can be migrated to class 3 work against Shippers and end consumers with large smart meter portfolios. The AUGÉ decision on class split of UIG has been done to encourage better settlement – this modification will negatively impact customers by delaying them being settled in the most cost effective way.
4. Utilita will be required to make fundamental changes to our systems to deliver this. These are unachievable and will result in financial detriment.

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

If implemented the we could expect a generous lead time for any changes to enable us to make the necessary changes - the proposed timescales.

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

Given the urgent nature of the modification we have been unable to fully impact assess the cost of the modification and would like to able to contribute accurate figure to an appropriately considered cost benefit analysis.

Utilita would face significant costs in system development to function cohesively with the new validation framework and the UIG costs.

Given substantial nature of the costs to Utilita of this Modification we would need to see a proper cost benefit model before providing support for this change.

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

To be reviewed

Are there any errors or omissions in this Modification that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

The process for read resubmission and replacement has still not been clearly defined and is of vital importance.

The process of FINC reading and the ability to submit our own is also omitted and requires clarification.

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