

## 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](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Alison Price
<b>Organisation:</b>	Npower Ltd
<b>Date of Representation:</b>	06/08/19
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	f) Positive

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

We support this change as an enabler to ensure that the CDSP has capability to manage the significant increase in Class 3 Supply Meter Point read submissions.

We remain concerned that shippers could move inappropriate sites into class 3 as a mechanism for avoiding additional UIG charges whilst not submitting reads at the appropriate frequency – therefore disadvantaging more responsible shippers

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

For this change to be implemented, we would like to see the associated Reporting Requirements formally included as part of the MOD; XOperate, Shipper and PAF reporting should be amended to fully take account of the revised read submission process so that the industry has visibility, transparency and control of shipper read submission performance from day 1 and not in the future where some shippers may have reaped significant commercial advantage by moving sites to class 3 read submission.

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

TBC

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

Yes

**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.*

As mentioned already, we would like to see this MOD incorporate the associated Reporting Requirements.

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