

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:	Rose Kimber
Organisation:	CNG LTD
Date of Representation:	07.08.19
Support or oppose implementation?	Qualified Support/Comments
Relevant Objective:	f) Positive

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

From a shipper perspective we support the principles of the change as this would limit the risk of high volumes of data being sent at once.

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

We would be supportive of a fast track implementation in order to limit the impacts on central industry systems.

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

There are no direct impacts on our core systems, however we would need to implement consequential changes due to our shipper / supplier relationships.

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

See below for questions regarding Legal Text.

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.*

These aren't omissions / errors as such but we do have the following questions regarding the Legal Text from a shipper perspective:

Page 7/10, Business Rule 4 – “The Shipper may specify a particular Meter Reading Date that the CDSP must seek to load to UK Link systems within each Month specifically in order for Shippers to align Settlement periods with the CDSP.”

How does a Shipper specify the Meter Reading Date for the CDSP? Is this aligning to an existing process or would a new process be required.

Page 7/10, Business Rule 5 – “Shippers shall, in good faith, provide indicative volumes of transfers to Class 3 and CDSP shall monitor the requested volumes against capacity of Class Changes and where the CDSP determines that this will impact the ability to process the indicative volumes, Shippers will be limited to a User Class 3 Daily Capacity which shall be determined by the CDSP.”

How will the shipper provide the indicative volumes?

How will the CDSP determine the Class 3 Daily Capacity per shipper, or all shippers etc, and how will this level be communicated?

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

n/a