

Representation - Modification UNC 0700 (Urgent)
Enabling large scale utilisation of Class 3

Modification Report

- 1. Consultation close out date:** 7th August 2019
- 2. Respond to:** enquiries@gasgovernance.co.uk
- 3. Organisation:** Gazprom Energy
5th Floor
8 First Street
Manchester
M15 4RP
- 4. Representative:** Steve Mulinganie
Regulation Manager
stevemulinganie@gazprom-mt.com
0799 097 2568
- 5. Date of Representation:** 6th August 2019
- 6. Do you support or oppose Implementation:**
We **Support** implementation of the Modification
- 7. Please summarise (in 1 paragraph) the key reason(s) for your position:**
As an existing Class 3 user we agreed to raise the modification on behalf of Xoserve (CDSP) to address a material risk to the stability of central systems due to large scale migration to Class 3 ahead of the start of the Gas year.
- 8. Are there any new or additional Issues for the Modification Report:**
No
- 9. Self-Governance Statement Do you agree with the status?**
NA

10. Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

This Modification furthers Relevant Objective f) as it promotes efficient use of UK Link systems and avoids the need for over investment in capacity that will potentially be redundant for significant portions of any given month, by smoothing Meter Reading submission profiles. This will avoid the need to build additional capacity for those Supply Meter Points which have been moved to Class 3 purely to take advantage of the UIG Weighting Factors.

11. Impacts & Costs:

What analysis, development and on-going costs would you face if this modification was implemented?

We **have not** identified any significant costs associated with this modification

12. Implementation:

What lead times would you wish to see prior to this modification being implemented, and why?

As Urgent Procedures are proposed, implementation would be agreed at DSC Change Committee in consideration of direction or guidance provided by the Authority

Process	Date
Ofgem Decision on Urgency	19 July 2019
Consultation Commences	22 July 2019
Consultation Close-out for representations	7 August 2019
Final Modification Report available for Panel	9 August 2019
Modification Panel recommendation	15 August 2019
Ofgem Decision expected by	28 August 2019

13. Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

We have **no** comments on the Legal Text provided.

14. Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or you wish to emphasise.

We would welcome clarification as to how Class 3 EUC1 reads will be managed when considering the application of inner and outer read tolerances. As only a subset of the Class 3 EUC1 reads will be loaded in central systems there is the potential for tolerances to be breached which would not have occurred had all the reads been loaded.

We would also note the need for a suitable performance management regime to be put in place to ensure that parties accessing Class 3 for EUC1 are submitting daily reads in accordance with the requirements for a Class 3 Supply Point.

Due to the urgency of the issue and need for a solution to be implemented quickly we would welcome the opportunity for further analysis to be undertaken to in particular determine if this tactical solution should continue to be enduring.