

Representation - Draft Modification Reports

UNC 0633 - Mandate monthly read submission for Smart and AMR sites from 01 December 2017

UNC 0638 - Mandate monthly read submission for Smart and AMR sites from 01 April 2018

Responses invited by: 5pm on 20 November 2017

To: enquiries@gasgovernance.co.uk

Representative:	Lorna Lewin
Organisation:	Orsted
Date of Representation:	20 November 2017
Support or oppose implementation?	0633 – Comments 0638- Support
Preference:	<i>If either 0633 or 0638 were to be implemented, which would be your preference?</i> 0638
Relevant Objective:	d) Positive

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

We support the intention of both modifications to address the issues of unidentified gas volatility. Both modifications will achieve the CMA Gas Settlement order, however 0638 aligns with the implementation date given by the CMA of 1 April 2018 and supports industry responses to the consultation for UNC modification UNC594R.

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

This should align with the CMA implementation date of 1 April 2018

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

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

We have no views on the legal text

Modification Panel Members have requested that the following questions are addressed:

Q1: Is this proposal inconsistent with the CMA requirement?

Q2: Do you believe there are any implications and/or consequential impacts that this proposal might have on Transporters' "must read" obligations?

We have not been able to assess any impacts

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.*

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