

## Representation - Draft Modification Report UNC 0672

### Target, Measure & Report Product Class 4 Read Performance

Responses invited by: **5pm on 15 May 2020**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Kirsty Dudley
<b>Organisation:</b>	E.ON
<b>Date of Representation:</b>	12/05/2020
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<b>d)</b> Positive

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

E.ON support this modification as we believe a volumetric based target rather than a site-based target is a much more valuable performance measurement, both in targeting Shippers fairly and contributing to a reduction in UIG. We agree that this will incentivise Shippers to prioritise their larger supply points ensuring they are submitting regular actual reads which in turn will reduce the risk of UIG.

In addition, we support the reporting aspect of this modification which will ensure the MPR level data is shared with Shippers. This will be particularly useful because it will inform Shippers of underperforming sites which we can then be prioritised to rectify and improve overall performance.

We recognise that the UNC change also captures the IGT UNC supply points because the IGT UNC text points directly to the UNC clause, so we expect reporting to be all MPRs and not just UNC because of this.

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

We would recommend aligning to or delivering no earlier than UNC 0692S (subject to Authority decision on the appeal), Should UNC 0962S not be implemented then we would still support a November 2020 implementation.

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

No system impacts have been identified, however we recognise some internal reporting and process development requirements which would need to be delivered. This is not expected to be project sized costs.

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

No Comments

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

*Q1: Views are requested on whether this Modification should be the subject of Self-Governance or Authority Direction?*

There is a possibility of commercial impacts because of the targets and due to this we believe this should be presented to the Authority for decision.

Additionally, we see a link between this modification and 0692S, and due to that modification being with the Authority for the review of the appeal, we believe this decision should go to the Authority too.

**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.*

We recognise that there isn't the need for an IGT UNC modification due to the IGT text already pointing to the relevant section, however should the modification be approved we support cross-code discussions between the UNC and IGT UNC to issue a note to IGT parties ensuring they are aware of the implementation also as there is not a modification to prompt it.

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

No Comments.