

Representation - Draft Modification Report UNC 0681S

Improvements to the quality of the Conversion Factor values held on the Supply Point Register

Responses invited by: **5pm on 11 July 2019**

To: enquiries@gasgovernance.co.uk

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

Representative:	Megan Coventry
Organisation:	On behalf of Southern Electric Gas Ltd and SSE Energy Supply Ltd
Date of Representation:	11/07/19
Support or oppose implementation?	Support
Relevant Objective:	d) Positive f) Positive

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

Self-Governance Statement: *Please provide your views on the self-governance statement.*

This is a sensible change to improve the accuracy of conversion factors by allowing the CDSP to amend them in the circumstances specified within the modification and it should contribute towards a reduction in UIG within a relatively short timescale.

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

We support the two part implementation proposed in the draft modification report (i.e. an enduring implementation linked to the DSC change proposal and related date, and a one-off update of meter points between 30 and 60 supply point systems business days after implementation).

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

We do not anticipate any specific costs related to this modification.

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 Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

No.

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

N/A