

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:	Kirsty Dudley
Organisation:	E.ON
Date of Representation:	11/07/2019
Support or oppose implementation?	Support
Relevant Objective:	d) Positive f) Positive

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

We support the implementation of this principle which works to ensure a safety net is in place to highlight and update incorrect conversion factors. It also seeks to address the known incorrect values which haven't been addressed for some time.

We recognise that some suggestions for the DSC solution have raised concerns but as this proposal seeks to introduce a process which ensures adherence to the thermal energy regulations we support it. We believe the DSC Change Management Committee can resolve the design requirements upon successful approval of this modification.

This is an initial stepping stone and may require further work to address all scenarios where incorrect conversion factors occur; this modification addresses the vast majority of the issues identified which we see as a positive step.

This solution was also a suggestion from the UIG Task Force and could seek to address an element of the ongoing UIG issues Shippers face.

We therefore support the principles being introduced into the UNC.

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

We support the change being introduced as Self-Governance and it doesn't require authority decision.

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

We support delivery in two parts to address the outstanding incorrect values and to introduce an enduring process.

Both should be in line with the DSC Change Committee deliverables but ideally part 1 would be delivered before the end of 2019.

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

The final solution designed via the DSC change process could have cost implications, but these are being ratified as the change develops via the capture process.

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

We have no comments on the legal text.

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 have not identified any errors.

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

We have nothing further to add.