

Representation - Modification UNC 0722 (Urgent)

Allow Users to submit Estimated Meter Reading during COVID-19

Responses invited by: **1pm on 27 April 2020**

To: enquiries@gasgovernance.co.uk

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

Representative:	Danny Byrne
Organisation:	Utilita Energy Ltd
Date of Representation:	24/04/2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive/

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

It will provide more accurate allocation across the industry.

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

Utilita will not require significant lead time to implement these changes.

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

Utilita would expect minimal costs for development.

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

Utilita are happy with 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.*

How will UK Link ensure that estimated reads submitted as actual reads during the COVID-19 pandemic would be entered into settlement and not rejected if it does not "normally" fall in line with expected tolerance thresholds based on the current AQ and would normally be a market breaker.

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

These temporary measures are mentioned as being in place for the duration of the COVID-19 pandemic, will this be left to UNC to determine and advise parties on when this period is over and the temporary measures are no longer in place? It leaves room for confusion and disparity between industry, should shippers need to determine this themselves based on Government advice.