

Representation – Modification UNC 0634 (Urgent)

Revised estimation process for DM sites with D-7 zero consumption

Responses invited by: **5pm on 03 November 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Andrew Margan
Organisation:	Centrica Plc
Date of Representation:	30 October 2017
Support or oppose implementation?	Oppose
Relevant Objective:	None

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

This proposal has been raised to address UIG issues relating to Daily Metered sites causing UIG volatility, when a read is not accepted into settlements. Whilst we believe this proposal will act as an incentive for DM sites to submit more reads, which is good, we are concerned this proposal won't necessarily reallocate the UIG to the correct party. As there is no evidence this proposal if approved will result in an improvement in UIG allocation and reduce volatility, we are currently unable to support Modification 0634.

We would welcome a strategic review of the UIG concerns that is able to evidence measures that will better address UIG allocation and the perceived increased volatility.

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

N/A

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

N/A

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

Accepted

Are there any errors or omissions in this Modification that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

None identified

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

No