

Representation - Draft Modification Report UNC 0690S

Reduce qualifying period for Class 1

Responses invited by: **5pm on 24 January 2020**

To: enquiries@gasgovernance.co.uk

Representative:	Edward E Fyfe
Organisation:	Scotland Gas Networks and Southern Gas Networks
Date of Representation:	22/01/2020
Support or oppose implementation?	Support
Relevant Objective:	<p>a) None</p> <p>b) None</p> <p>d) Positive - the securing of effective competition.</p>

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

SGN fully supports this Modification which proposes that the qualifying period for the requirement for a meter point to become Class 1 is reduced. SGN also supports the creation of additional reporting to help facilitate this change.

SGN believes this Modification will help increase the number of meter reads being supplied to the Central Data Services Provider (CDSP), which in turn will support the allocation of gas to the correct Supply Point. The Unidentified Gas (UIG) Task Force (as established under UNC Modification 0658) has identified that low rates of meter read performance can be a significant contributing factor to UIG. We feel this modification will help address this issue, which in turn will help in the securing of effective competition between relevant shippers.

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

We agree with the Self-Governance Statement within the modification that this is a non-material change.

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

As soon as reasonably practicable. However, the Central Data Services Provider (CDSP) and the Shippers will need to dedicate time to implement the changes and calibrate the reporting mentioned above.

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

No SGN costs or system development time has been identified.

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.*

None Identified

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

None to add.