

## Representation - Draft Modification Report UNC 0704S

### Transporter Theft of Gas Reporting

Responses invited by: **5pm on 07 May 2020**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Olga Batsari
<b>Organisation:</b>	Wales & West Utilities
<b>Date of Representation:</b>	7 <sup>th</sup> May 2020
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<b>c)</b> Positive <b>f)</b> Positive

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

We support implementation as it simplifies reporting of Transporter theft, aligns reporting timescales and revises the information reported to report those items that are useful. It therefore furthers relevant objective (f) in respect of improving the efficiency of the administration of the Code and relevant objective (c) efficient discharge of licensee's obligations in respect of Standard Licence Condition 7 that relates to Transporter obligations to investigate and report theft of gas.

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

We agree that this modification satisfies the self-governance criteria. The changes will not have a material impact on competition nor any other of the criteria.

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

We agree that implementation could be sixteen business days after an modification panel decision to implement subject to no appeal being raised.

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

We do not anticipate any appreciable cost being incurred

**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**

We note that this and the related SPAA Change Proposal 480 are the only outputs to date from the UNC / SPAA cross code Joint Theft Reporting Review Group.