

## 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](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Carl Whitehouse
<b>Organisation:</b>	First Utility
<b>Date of Representation:</b>	03 November 2017
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	d) Positive

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

This modification proposes an alternative process for amending consumption on Class 1 Daily Metered (DM) sites to prevent inappropriate D-7 zero estimated consumption entering the settlement calculation. One of the unintended consequences of the current mechanism is when a Class 1 DM site consumes gas on a particular day but does not manage to submit a Valid Meter Reading and the D-7 consumption is zero. In this situation, the volume is allocated to unidentified gas which is mostly paid for by NDM shippers until a Valid Meter Reading is submitted and accepted.

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

We would like to see immediate implementation following Authority decision due to the urgency of this modification.

**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?*

Yes

**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.*

No

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

N/A