

## Representation - Draft Modification Report UNC 0651 Changes to the Retrospective Data Update provisions

Responses invited by: **5pm on 09 August 2018**

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

<b>Representative:</b>	Mark Bellman
<b>Organisation:</b>	ScottishPower Plc
<b>Date of Representation:</b>	09 August 2018
<b>Support or oppose implementation?</b>	Oppose
<b>Relevant Objective:</b>	d) Negative

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

SP believe that a data cleanse exercise on its own will not allow sufficient correction (for example is there sufficient functionality currently to ensure appropriate retrospection where required to fully correct a record?). The two exercises would be “coincident” (not one after the other). SP preferred position would be the enduring fix rather than a data cleanse exercise.

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

ScottishPower agrees that this modification requires authority decision given the material impact of modification.

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

Minimum of 6-9 months plus 12 months for data cleans exercise.

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

Insert Text Here

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

No comment on 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.*

N/A

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

N/a