

Representation - Draft Modification Report UNC 0652

Introduction of winter read/consumption reports and associated obligations

Responses invited by: **5pm on 14 March 2019**

To: enquiries@gasgovernance.co.uk

Representative:	Mark Bellman
Organisation:	ScottishPower
Date of Representation:	11 th March 2019
Support or oppose implementation?	Support/Oppose/Qualified Support/Comments * <i>delete as appropriate</i>
Relevant Objective:	d) Positive/Negative/None * <i>delete as appropriate</i>

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

Error in the profiling of consumption is a contributor to Unidentified Gas. This proposal will reduce UIG by better winter profiling for EUC03-09 sites.

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

ASAP.

The sooner this is implemented the more time shippers have to ensure they can comply and improve winter profiling.

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

None.

For those sites that are targeted by this Mod there should be no additional costs other than those required to comply with the existing UNC obligation (where those meters are >293 MWh) or the existing CDSP process for all other meters.

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

Yes (finally!)

Modification Panel Members have requested that the following questions are addressed: *Remove Section if no questions*

Q1: Please provide clear views and supporting evidence on the self-governance status of this modification focusing, in particular, on whether this proposal is likely to have a material impact upon competition in the shipping, transportation or supply of gas.

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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