

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

<b>Representative:</b>	John Welch
<b>Organisation:</b>	npower
<b>Date of Representation:</b>	14/03/2019
<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)**

We support this modification as it looks to improve data submission levels for more accurate usage of WAR band profiles, by adding additional weight to pre-existing processes. In conjunction with the introduction of reports through a linked DSC change proposal, this will make these pre-existing processes more visible and robust. In turn, this will have the effect of improving data accuracy in an area that contributes to levels and volatility of D+5 UIG.

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

We support immediate implementation of the modification, which would mean the obligation to supply winter data (where reads were not submitted but data is available) would be applicable from September 2019. The report to be circulated in May (noted in the obligation) already exists, as does the process and mechanism to supply winter data, so there is no need for any additional development here.

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

None 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**

No additional information supplied.