

Representation - Draft Modification Report UNC 0674

Performance Assurance Techniques and Controls

Responses invited by: 5pm on 24 May 2021

To: enquiries@gasgovernance.co.uk

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

Representative:	Claire Louise Roberts
Organisation:	ScottishPower
Date of Representation:	24 th May 2021
Support or oppose implementation?	Support
Relevant Objective:	d) Positive f) Positive

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

ScottishPower is in support of the implementation of this modification as it seeks to address Settlement inaccuracies that have been identified.

Accuracy of RAQs, FYAQs and therefore cash-out and transportation charges, reducing uncertainty and therefore lowering bills is potentially improved by the more reads entering Settlement.

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

The next scheduled industry release date is November 2021, if a decision has not been reached by the authority in time to achieve this date, it would be our recommendation for implementation to be the next available release date which would be February 2022.

We would like to note IGT138 has a dependency on implementation of UNC0674 and would like them to be delivered at the same time.

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

This would be minimal and only to comply UNC.

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

Yes

Modification Panel Members have requested that the following questions / considerations are addressed:

Q1: Provide a view on whether respondents think it is appropriate to impact non-UNC parties with this proposal?

Yes, ScottishPower believes it is appropriate. The modification does not confer any obligations on non-parties outside of the code. It requires PAC to investigate any potential impacts that non-parties are having on parties' ability to comply or otherwise on settlement accuracy.

It is expected this is likely to apply to metering agents, but there may be other non-parties.

PAC needs to be made aware when a party signatory to UNC is being impacted by non-UNC parties. This will allow PAC to make a judgment when dealing with a UNC party where Settlement risk has been identified and is out of their control to remedy.

This is similar to the practice by BSC PAB who engage with third party meter agents on performance despite them not being party to BSC. However, under BSC a Supplier's agents are required to qualify in the agent role and this gives PAB vires to investigate their performance. As no such qualification is required by UNC the proposed provisions ensure that parties acknowledge that PAC may investigate non-parties' impact on Settlement.

Q2: Consider impact of proposal for the overarching principle to apply to Modification Panel, UNCC, Sub Committees and Parties as set out in business rule 2a.

The legal text has been drafted in a manner that ensures the PAO applies only to performance assurance parties which as defined does not include MOD Panel, UNCC or sub-committee.

ScottishPower believe that this legal drafting is to provide clarity to Performance Assurance Parties of one key desired outcome from UNC compliance. While the UNC obligation does not apply to Mod Panel, UNCC or sub-committees the effect of this is to inform their decisions.

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

PAC Reports – level of compliance with various UNC obligations, in particular Read Submission.

PAC Risk register which has been developed and highlights areas of risk to settlement.