

Representation - Draft Modification Report UNC 0691S

CDSP to convert Class 2, 3 or 4 meter points to Class 1 when G1.6.15 criteria are met

Responses invited by: **5pm on 07 August 2020**

To: enquiries@gasgovernance.co.uk

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

Representative:	Claire Roberts
Organisation:	ScottishPower
Date of Representation:	7 th August
Support or oppose implementation?	Support
Relevant Objective:	a) Positive d) None

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

ScottishPower support this modification, we agree any Supply Meter Points that meets the criteria to become Product Class 1 should not be classified as Product Class 2, 3 or 4. This will incentivise Shippers to reclassify the Supply Meter Point where they qualify (G1.6.15) to become Product Class 1. We believe this change will have a positive impact on UIG and thereby look to reduce UIG volatility across the Industry.

We are in support of the new PAC reports in PARR as this will provide the Industry with a view of Supply Meter Points that are either not in Product Class 1 that are above the Class 1 AQ threshold or where the Supply Meter Point has been reclassified by the CDSP over previous 12 months.

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

We support self-governance statement as do not believe this modification will have a material impact on the end consumer billing arrangement.

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

Implementation should align with Xoserve change proposal XRN5038, this change was raised in parallel of modification 0691.

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

ScottishPower have not identified any costs at present

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

For information: legal text for UNC Modification 0691S has been provided with UNC Modification 0708S legal text in mind. It is recommended therefore that UNC Modification 0691S legal text, if approved, is inserted into the Uniform Network Code after the UNC Modification 0708S effective date (as aligned with IGT137 timescales) of 05:00 on 24 July 2020.

No comment

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 further comments

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

No further comments