

Representation - Modification UNC 0723 (Urgent)

Use of the Isolation Flag to identify sites with abnormal load reduction during COVID-19 period

Responses invited by: **1pm on 27 April 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:	27 th April 2020
Support or oppose implementation?	Support
Relevant Objective:	a) Positive d) Positive

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

ScottishPower supports the principle of this modification which will enable users to utilise the central system isolation flag throughout Covid-19.

We would however seek clarity on the following:

- What evidence would be needed to have the isolation flag set, would this be at the request of the customer and what level of audit trail would be required e.g. written confirmation from the customer?

What controls would be put in place to ensure when a site has an isolation flag applied due to the Covid-19 situation, what measures will be in place following this to correctly remove the flag?

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

As directed by Ofgem.

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.*

N/A

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

N/A