

Representation - Modification UNC 0722 (Urgent)

Allow Users to submit Estimated Meter Reading during COVID-19

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:	Rebecca Louth
Organisation:	ENGIE
Date of Representation:	27/04/2020
Support or oppose implementation?	Support
Relevant Objective:	d) None

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

ENGIE supports Modification 0722 as we believe it presents a pragmatic approach to combat the issues caused by shut-down or under-consuming sites during the COVID-19 crisis by accepting estimated readings as actuals to allow for regular updates as to what the Shipper and customer estimate the consumption to be.

This will allow for a representative volume to be used for gas settlement reducing issues with AQs and UIG.

However, while we support this Modification, we would like to understand what (given the difficulty of communicating with customers at this time) constitutes evidence to correct the readings and whether there is the ability to use this modification alongside modification 0721.

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

ASAP

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

Impacts surrounding customer communication and understanding what is currently occurring at sites.

Potential operational impacts in determining and sending the estimated readings to industry.

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