

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:	Dr Rebecca Hooper
Organisation:	Mineral Products Association
Date of Representation:	27 th April 2020
Support or oppose implementation?	Support/Oppose/Qualified Support/Comments * <i>delete as appropriate</i>
Relevant Objective:	<p>a) Positive/Negative/None * <i>delete as appropriate</i></p> <p>d) Positive/Negative/None * <i>delete as appropriate</i></p>

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

The Mineral Products Association (MPA) understands the reasoning behind the proposed temporary modification to ensure that costs for unidentified gas (UIG) are not applied to sites that are no longer consuming gas due to temporary cessation.

However, this approach is based on an assumption that there will be no increase in UIG costs per unit for business that remain operating. Businesses continuing operations are providing often essential services and so it would be counterproductive for businesses to have increased charges as a result of this operation.

In implementing this modification there should be assurance for wider consumers that UIG costs will not increase as a result.

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

Insert Text Here

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

Insert Text Here

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

Insert Text Here

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.*

Insert Text Here

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

Insert Text Here