

Representation - Modification UNC 0721 (Urgent)

Shipper submitted AQ Corrections 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:	Claire Roberts
Organisation:	ScottishPower
Date of Representation:	27 th April 2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

In principle ScottishPower supports what this change intends to achieve to give authority for the CDSP to accept requests from Shippers who submit AQ corrections EUC bands 2-9. Given the current situation with Covid-19 there will be a number of sites that are consuming less or no gas, this modification will allow shippers to give more accurate AQs for these sites and will provide more accurate allocations and a more reflective UIG.

Whilst we support the intent of this modification there is a level of detail that is lacking:

- Clarity on how the AQ correction will be triggered – Details would be required on whether this was at a customer request and what level of audit trail would be required.
- Detail on how will the new AQ would be determined - Will it be an agreed industry percentage, or will it be at each individual supply meter point level based on circumstances?
- What would happen post lockdown – Clarification would be needed on how AQ's would be treated post lockdown. Currently an AQ change can only be requested every nine months, would this be waived should lockdown end sooner and MPRNs return to previous levels.

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 as no system changes proposed

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.*

Is there an IGT UNC impact

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

n/a