

Representation - Draft Modification Reports

UNC 0633 - Mandate monthly read submission for Smart and AMR sites from 01 December 2017

UNC 0638 - Mandate monthly read submission for Smart and AMR sites from 01 April 2018

Responses invited by: 5pm on 20 November 2017

To: enquiries@gasgovernance.co.uk

Representative:	Mark Jones
Organisation:	SSE Supply
Date of Representation:	20 November 2017
Support or oppose implementation?	0633 - Oppose 0638 - Support
Preference:	<i>If either 0633 or 0638 were to be implemented, which would be your preference?</i> 0638
Relevant Objective:	d) Positive

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

In order to comply with the CMA requirement a number of industry parties have set up project teams to deliver internal changes which are planned for 1st April 2018. To bring these changes in immediately is unworkable for a systemised solution and would require significant manual effort, which may be unachievable to meet the timescales in Modification 0633. The date of the CMA requirement was reviewed and discussed at length in the UNC Workgroup 0594R, with a subsequent Request for Information (RFI) being issued. The RFI responses were very much in favour of retaining the 1st April 2018 implementation date as originally specified in the CMA requirement and most parties confirmed that they are working to meet this April 2018 implementation date.

This date was confirmed by the CMA in a September communication, where it was stated by the CMA that it had received no request from shippers or other stakeholders to amend the date. The CMA also referenced the UNC Workgroup 0594R review, where no evidence was provided to amend the date. We, therefore, agree with the proposer that the Code obligations should align with the CMA remedy implementation date and in the absence of any credible evidence that it is the only date that the industry should be working towards.

There is also no evidence presented within Modification 0633 that implementing this modification would bring any benefits to the level or volatility of unidentified gas which this modification is seeking to address.

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

Implementation should be 1st April 2018 in line with the CMA requirement.

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

None identified over and above those required for the CMA requirement. We have not been able to analyse the costs should modification 0633 be implemented, but believe that they would be significant.

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

Yes.

Modification Panel Members have requested that the following questions are addressed:

Q1: Is this proposal inconsistent with the CMA requirement?

In our opinion Modification 0638 is consistent with the CMA requirement

Q2: Do you believe there are any implications and/or consequential impacts that this proposal might have on Transporters' "must read" obligations?

No.

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.

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