

Representation - Draft Modification Report UNC 0654

Mandating the provision of NDM sample data

Responses invited by: **5pm on 07 September 2018**

To: enquiries@gasgovernance.co.uk

Representative:	Kirsty Dudley
Organisation:	E.ON
Date of Representation:	22/08/2018
Support or oppose implementation?	Support
Relevant Objective:	d) Positive f) Positive

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

We support the mandating of the sample data, it will have a positive impact to the modelling.

The creation of the PAC reporting acts as a first step to monitor the data delivery, any further steps or sanctions can be developed at a later date, if required.

We support both the UNC and IGT UNC modifications.

Self-Governance Statement: *Please provide your views on the self-governance statement. In particular do you consider the Modification is suitable for Self-Governance?*

We would consider the request for the data as self-governance, although it links with UIG the data doesn't influence the daily position but more ensures accuracy of the modelling. As this modification just enables a report and the monitoring of report submission we do not feel it is a material change and would support self-governance for the UNC and the IGT UNC modification.

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

Around 3 months to allow for the creation of the enduring report.

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

Low cost, costs include creation and implementation of the enduring report.

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

Yes – no additional comments

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 comments

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

NA