

## 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](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Paul Bedford
<b>Organisation:</b>	Opus Energy
<b>Date of Representation:</b>	21/08/2018
<b>Support or oppose implementation?</b>	Support * <i>delete as appropriate</i>
<b>Relevant Objective:</b>	<b>d)</b> Positive * <i>delete as appropriate</i> <b>f)</b> Positive * <i>delete as appropriate</i>

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

Having a greater quantity and frequency of gas read data available should, at least in theory, reduce the overall discrepancies between the standard industry profiles and actual consumption, meaning less error in the gas allocation process and a smaller initial UIG pot. It should also allow DESC to more easily analyse introducing additional EUCs such as domestic, non-domestic and prepayment for AQ band 1s.

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

In line with the Modification Panel determination, we believe this change is likely to have a material impact because of impact on UIG and allocation and commercial arrangements for Shippers. We therefore believe this modification should follow Authority Direction procedures.

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

3 months. This will allow sufficient lead-time to develop reports and put in place processes. The proposed implementation date of 16 business days after a decision to implement would not be sufficient given the changes required.

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

Negligible

**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.*

No

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

N/A