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:	Graham Wood
Organisation:	British Gas
Date of Representation:	07/09/2018
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

We support the implementation of this modification and believe sharing NDM data by shippers/suppliers will lead to more accurate allocation and future profiles for class 3 & 4 customers.

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 support this modification progressing as self-governance.

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

As soon as possible

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

We have not identified any major costs which would be associated to this change. Some resourcing time would be required to facilitate collating the sample data.

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

Yes

Joint Office of Gas Transporters

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

We note that the timeline to submit the data (5th business day of month) could be impractical to suppliers, and DESC's expectations should be managed accordingly.