

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:	Joshua Phelps
Organisation:	The Renewable Energy Company (trading as Ecotricity)
Date of Representation:	07 September 2018
Support or oppose implementation?	Support * <i>delete as appropriate</i>
Relevant Objective:	d) Positive f) Positive

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

We support this implementation due to the positive impacts it shall have for creating more representative profiles which should reduce UIG volatility.

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 believe that this modification shouldn't be subject to self-governance. On the surface, this modification looks to fulfil the self-governance criteria. However, when considering the potential gaming issues highlighted later in our response, purposeful gaming could have unfortunate consequences. Should better controls be in place to prevent gaming, then we'd agree that this would be subject to self-governance.

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

We feel that a minimum of three months' notice is needed to allow enough time for shippers to scope their internal mechanisms for collating this data in accordance with the proposed business rules. Any shorter time frame will drive shippers away from a monthly submission schedule in order to perform the internal work required to submit this obligated data.

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

No comment.

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

No comment.

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.*

Although the business rules shall mandate that the data be randomly selected, we don't believe there are enough controls in place to prevent shippers from gaming the system by selecting which data they provide.

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

No comment.