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:	Mark Jones
Organisation:	SSE Supply
Date of Representation:	07 September 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)

The provision of more sample data will allow the CDSP to calculate gas demand profiles more accurately, which should then result in improvements in gas settlements including lower and less volatile levels of UIG, a major concern to the industry since the implementation of Project Nexus.

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 agree with the Modification's Panel view that this modification should follow Authority Direction.

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

Due to IT system development being required we believe that the modification should be implemented 6 months after an Authority decision to approve it.

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

We would incur some IT development costs to provide this 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.

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