

Representation - Draft Modification Report UNC 0652

Introduction of winter read/consumption reports and associated obligations

Responses invited by: **5pm on 14 March 2019**

To: enquiries@gasgovernance.co.uk

Representative:	Paul Bedford
Organisation:	Opus Energy Limited
Date of Representation:	13/03/19
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

We are supportive of this proposed modification because the current assigned default Winter Annual Ratio is adversely impacting levels of Unidentified gas (UIG). This proposal should reduce levels of UIG.

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

A 6 month lead time is requested as this is a commonly recognised minimum timescale amongst some Industry Codes.

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

Some additional costs would be incurred (full internal analysis not yet completed) but the benefits to reduced levels of UIG would justify this.

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

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