| Representation - Draft Modification Report UNC 0690S<br>Reduce qualifying period for Class 1 |                 |
|--|-----------------|
| Responses invited by: 5pm on 24 January 2020   |                 |
| To: enquiries@gasgovernance.co.uk  |                 |
| Representative:  | Owen Boland     |
| Organisation:  | Utilita         |
| Date of Representation:  | 14 January 2020 |
| Support or oppose implementation?  | Comments        |
| Relevant Objective:  | a) None         |
|  | b) None         |
|  | d) None         |

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

We support the proposal for a reduction in timescale for the class 2, 3 and 4 sites to move into class 1 upon reaching a class 1 threshold. We agree that this will support the UIG taskforce in their overall efforts to reduce UIG. Additionally, we also agree with the additional reporting needed to help facilitate this.

Self-Governance Statement: Please provide your views on the self-governance statement.

We support the Modification Panel determination this this is suitable for self-governance procedures.

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

Implementation should be carried out after shippers are able to review their processes and systems in order to implement this on their meter point portfolio.

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

N/A

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

N/A

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.

N/A

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

N/A