

Submitted by email

Dear colleague,

Thank you for the opportunity to submit representation responses on the Urgent modifications.

We are encouraged to see the industry working together so positively in a short period of time to develop constructive solutions at this unique time.

These modifications rely upon use of existing processes in order to minimise system changes to all industry parties and to ensure that the challenging timescales necessary for the industry response can be met. We encourage Users to ensure that they are familiar with the way that UK Link Communications are to be submitted in order to make use of this capability afforded by these modifications. Xoserve are proposing a workshop to support Users which will run on 29th and again on 30th to support Users in this way.

We encourage all Users to contact their Customer Advocate to support the CDSP in understanding and preparing for the volumes anticipated through each process.

We do offer specific comments with regards to modification 0721 – Shipper submitted AQ Corrections during COVID-19. We appreciate that the proposer has limited this functionality to Supply Meter Points in EUC bands 2-9 or that are isolated. We remain concerned regarding the potential volumes significantly exceeding previous peak processing. We note that the modification itself does not explicitly ask for the CDSP to cancel any Corrections which do not adhere to the criteria in the modification as we would expect that Shippers would adhere to these rules. As the AQ Correction process is an exception process and typical volumes are no more than 3,000 transactions in a normal month, this is not a process that has previously been considered necessary for performance scaling – so if we see non compliant Corrections we will highlight these to Shippers such that they utilise cancellation functionality. We would not expect that we would require this, but in the event that it is necessary we would anticipate discretion to submit these on a Shipper's behalf.

We note that Unidentified Gas (UIG) is currently very volatile, and that a major contributor is likely to be the unexpected demand patterns amongst Non-Daily Metered sites. We are aware that the use of the Isolations Flag for sites still consuming a de minimis quantity of gas and any inaccuracy in the revised AQs or estimated readings submitted by Shippers could also contribute to daily UIG. In all cases the next true actual meter reading will cause a Meter Point Reconciliation which would also correct the UIG position.

Regards

Dave

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