

## Representation - Draft Modification Report UNC 0816S

### Update to AQ Correction Processes

**Responses invited by: 5pm on 06 June 2023**

**To:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	David Mitchell
<b>Organisation:</b>	Scotland Gas Networks Ltd and Southern Gas Networks Ltd
<b>Date of Representation:</b>	31st May 2023
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	d) Positive f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

SGN supports this modification as it will help to improve the accuracy of Annual Quantities (AQ) held in the central systems. The addition of the two new eligible causes, Erroneous AQ based on read history and change in operation and/or use will give added transparency as to why an AQ has been amended. The eligible cause Erroneous AQ based on read history is intended to be utilised where a Supply Meter Point (SMP) has a read history outside of the current Registered User's ownership which is not representative of the current usage of the SMP, if such a situation arises the User may utilise an Erroneous AQ based on read history AQ Correction, SGN believes that this is a positive addition to the process of ensuring accurate AQ's are maintained. The other new eligible cause Change in Operation and/or use is intended to be utilised where a SMP has a change in use resulting in a need for an increase or decrease in AQ, SGN believes that this is a sensible addition to the process as once again it seeks to improve the accuracy of SMP AQ's. We support the proposers view that having business rules in place for requesting amendments against these two new reason codes will improve the process.

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

We agree with the justification for self-governance as we don't believe that this modification will have a material impact on consumers or competition.

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

This modification could be implemented sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised, however consideration will need to be given to aligning the implementation date with the relevant system delivery timescales that will be determined by DSC Change Management Committee.

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

SGN does not anticipate any impacts or costs as a result of this modification being implemented. We agree with the proposer's suggestion that this modification should be 100% funded by shippers.

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

We are satisfied with the legal text.

**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.*

None identified.

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

None identified.