

Representation - Draft Modification Report UNC 0816S

Update to AQ Correction Processes

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

To: enquiries@gasgovernance.co.uk

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

Representative:	Tom Stuart
Organisation:	Wales & West Utilities
Date of Representation:	22.5.23
Support or oppose implementation?	Support
Relevant Objective:	d) Positive f) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

Wales & West Utilities supports this modification as we believe it will encourage users to use the correct eligible cause when amending an QA by tightening the criteria that a site must meet to utilise the eligible causes. We support the general principle of enabling users to recording accurate AQs which we believe this modification is aiming to achieve. We also agree with the proposer's suggestion of 100% shipper funding as this modification focuses on AQ accuracy, which is a shipper responsibility.

This modification furthers relevant objective d) Securing of effective competition and furthers relevant objective f) Promotion of efficiency in the implementation and administration of the Code.

However, introducing additional eligible causes may provide users with more opportunities to amend AQs that they believe to be incorrect, rather than to tackle the core issue of AQ inaccuracies. The business rules do not address a way to report the misuse of eligible causes, which was identified as an issue during the workgroup discussions, though note that the corresponding Xoserve change will include reporting of the 2 new reason codes.

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

We agree with the justification for self governance

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

Agree with the 16-day implementation period.

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

We do not foresee any impacts or costs. We agree with the proposer's suggestion of 100% shipper funding as this modification focuses on AQ accuracy, which is a shipper responsibility.

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.*

None

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

None