

## 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>	Clare Manning
<b>Organisation:</b>	E.ON/E.ON Next/Npower Business Solutions
<b>Date of Representation:</b>	05/06/2023
<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)

As the Proposer of this modification, E.ON supports its implementation. We believe the addition of the two new eligible causes will provide greater transparency and accuracy, thereby enhancing current arrangements. The CDSP has already reported that the existing causes are being utilised for reasons other intended but that these are genuine reasons for amending the AQ. The addition of the new causes will provide a legitimate route for Users to be able to resolve issues with AQ and enable more accurate monitoring.

The CDSP also reported that AQ amendments were being submitted but without a change to the AQ and the working group could think of no legitimate reason why this should happen so the modification introduces the deminimis which we also support.

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

We agree that this modification satisfies the criteria for Self Governance

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

Implementation can be sixteen days but Users would not be able to utilise the new causes until the relevant system changes have been made.

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

No costs or impacts identified

**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

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

We note concerns that the business rules do not address a way to report the misuse of eligible causes or to reverse an AQ amendment if found that the eligible cause was used erroneously. This was discussed during the working group but considered to be outside the scope of this modification. We believe the PARR reporting enables sufficient monitoring.