

Consultation Response**IGT141U:** Pipeline User submitted AQ Corrections during COVID-19

Responses invited by: 12 MAY 2020

Respondent Details

Name: Sasha Pearce

Organisation: npower

Support Implementation ☐Qualified Support ☐Neutral **X**Do Not Support ☐

Please briefly summarise the key reason(s) for your support / opposition

We understand the intent of this Modification to address inaccuracy in AQs arising from changes in business activity as a result of COVID-19, however we have concerns about this proposal.

Whilst we agree that facilitating such a process should hopefully lead to more accurate AQs for businesses which might otherwise fail tolerances, more thought needs to be given to the knock-on implications and post-lockdown activities. We are particularly concerned that any corrections made would be in place for a minimum of 9 months which could lead to negative impacts which could not be undone once a site is out of lockdown. We think that it could potentially lead to inaccurate AQ prevailing for months if not years after the COVID crisis is over.

Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

We agree with the proposer that this should **not** be a self-governance modification.

Please state any new or additional issues that you believe should be considered

None

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

Given our concerns outlined above, we do not believe that this Modification will facilitate the relevant objectives.

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

None

Implementation

What lead time would you wish to see prior to this modification being implemented, and why?

No lead time required, implementation could follow immediately after approval.

Legal Text

Are you satisfied that the legal text will deliver the intent of the modification?

No comments

Further Comments

Is there anything further you wish to be taken into account?

No comments