

Representation - Draft Modification Report UNC 0710

CDSP provision of Class 1 read service

Responses invited by: 5pm on 08 October 2020

To: enquiries@gasgovernance.co.uk

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

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities
Date of Representation:	21 st September 2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive f) Positive

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

We support implementation as it will:

- 1) provide a sustainable service going forward;
- 2) give Shippers, collectively, more influence in determining the service provided by the CDSP; and
- 3) mean that Shippers have a common service and charge across GB rather than having a separate service from each DN.

Points (1) and (3) further relevant objective (f) *efficiency in administration of Code*; point (2) furthers relevant objective (d) *competition between Shippers* as it will enable Shippers to define the Class 1 read service and give them the opportunity to offer innovative services to their customers.

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

We support the view of workgroup and panel that this proposal satisfies the self-governance criteria for the reasons stated in the workgroup report.

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

We agree that the implementation should take place in Summer 2021 and we agree 1st June 2021 is a sensible implementation date. This allows implementation well before the start of the following winter.

The IGTs have been made aware of this modification for a considerable period and we understand that an IGT is proposing to raise a modification to make changes to the IGT UNC. This is required as the cross references from the IGT UNC to the UNC are likely to be incorrect when 0710 is implemented. IGTs also need to put in place arrangements either to mirror the arrangements of UNC 0710 in the IGT UNC or to provide a Class 1 read service themselves direct to Shippers. If this IGT change is not put in place Shippers will no longer receive daily reads for the handful of Class 1 Supply Meter Points on IGT networks. Given the proposed implementation date of UNC 0710 there will be ample time for the IGT modification to complete its process before the implementation date of UNC 0710.

We wish to have a decision on this modification so that the CDSP can proceed with the necessary contractual arrangements with the current Daily Metered Service Providers and also commence discussions with Shippers regarding the future arrangements once the current contracts are terminated.

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

WWU will not face any ongoing costs.

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

Yes, the legal text has had a lengthy period of review and a number of changes were made as a result of comments from workgroup members.

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.*

No

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

We support this modification proposal as it will put the service on a sustainable basis going forward following the considerable decline in the number of Class 1 Supply Meter Points since network sale in 2005. Neither Transporters nor Shippers are in a position to provide an ongoing service individually because the volume of sites would not be sufficient to provide a cost-efficient service and therefore the sensible solution is to have a centrally provided service from the CDSP. This arrangement will allow Shippers, collectively, to define the scope, KPI, and service levels they require when the CDSP procures a service on termination of the current contracts that will be novated. Currently Shippers have to take the service that the DNs offer them that fulfils the DN's UNC obligations. The majority of meter reading services were opened to competition about

20 years ago and making this change to the Class 1 read service is consistent with that approach of more user choice. We also anticipate that this may enable Shippers to provide new services to their customers as they will be able to design the daily read service to meet their requirements.