

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:	Kirsty Dudley
Organisation:	E.ON
Date of Representation:	06/10/2020
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 this Modification as we believe it will introduce efficiencies (more in the future) in provisioning of the class 1 read service. We anticipate that the future class 1 read services procured via the CDSP will promote competitive procurement for the DM read services which we also support.

We also believe that by removing the obligation from Transporters and placing it with the CDSP, it allows for a more cost effective and efficient way for Shippers when handling missing and late reads, as the existing process of claiming back costs from Transporters for failed reads is not efficient and does not necessarily align to a Transporters market role.

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

We believe that this modification should be treated as self-governance because this Modification changes primarily the contractual arrangements (a lift and shift between the Transporters and the CDSP) with the Daily Metered service providers (DMSPs).

We do not believe that there will be any system impacts or direct implications on end consumers allocated to settlement Class 1 so it doesn't require Authority decision making.

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

We support the workgroups view of an implementation date of 01 June 2021, it seems to be a reasonable implementation effective date, as it provides a window for any unexpected problems to be resolved upon the transfer of the read service without unintentionally impacting ratchet charges applicable over the winter period.

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

Limited direct costs anticipated, we recognise there is likely to be a CDSP administration fee but we support it moving to a service line and charges being more transparent moving forward.

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

No comment.

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.*

We are concerned that an IGT change has not been developed in full as this solution may have an impact, although we do not wish to see this modification held back because of IGT development, we would prefer that both modifications are implemented at the same time, and should the implementation date be June 2021, we believe there is adequate time to bridge this gap.

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

No comment.