

Joint Office

Enquiries@gasgovernance.co.uk

20th September 2022

Dear Joint Office,

UNC 0824: Appointment of CDSP as the Scheme Administrator for the Energy Price Guarantee (EPG) for Domestic Gas Consumers (Gas)

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

NGN supports this Modification Proposal.

Reason for support

We support this Modification as facilitates the Central Data Service Provider's (CDSP) ability to carry out the required system and data permission changes so that they can act as administrator for the governments Energy Price Guarantee for Domestic Gas Consumers Scheme. This Scheme is intended to compensate towards the cost of gas payments made by suppliers, which should reduce the risk of supplier failure, and reduce end domestic consumer bills, however we do have concerns that this is creating a new relationship under the UNC between CDSP and Suppliers (who are not a UNC party). The reduction in the overall cost of gas to suppliers should allow them to offer more competitive rates to end consumers, which furthers Relevant Objectives *d) securing of effective competition: (ii) between relevant suppliers.*

Implementation:

As the modification is under Urgent timeline, we believe this modification could be implemented on a date as instructed by the Authority. We note that the Scheme comes into effect on 1st October 2022 so would urge that the implementation is in advance of this date to allow the CDSP time to make the necessary system and data permission amendments.

Impacts and Costs:

None identified.

Legal Text:

The Legal text as provided in V1.0 (a change marked version 2.0 has since been provided to the Joint Office) of the modification contains an error in paragraph 1.9.11, which uses the word 'with' and this should be 'without':

1.9.11 Paragraph 1.3.1(c)) and this paragraph 1.9 may not be modified without the prior written consent of the Secretary of State.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

Smell gas?

Call the National Gas Emergency
Service on 0800 111 999

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Colton, Leeds LS15 8TU

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The modification as per V1.0 (a change marked version 2.0 has since been provided to the Joint Office) contains an inaccuracy under section 3 'Why Change'. The first sentence at the top of page 2 includes '(via the Shippers)'. This is factually incorrect and should have been removed:

The CDSP needs to be able to put in place the appropriate changes and data permissions in order to provide the relevant consumption data, receive payment from government and pass this on to the relevant Suppliers ~~(via the Shippers)~~.

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

The CDSP are a not-for-profit company whose primary purpose is to operate the central systems needed in order for UNC transactions between Shippers and Transporters to be carried out in accordance with code and relevant licence conditions. This must be their primary focus and with this in mind we would like to highlight that the setting up of this scheme has already impacted business as usual, due to demands on time and people within the CDSP, and may continue to do so until the appropriate resources are recruited and in place.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Tracey Saunders (via email)
Market Services Manager
Mobile: 07580 215 743

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