

## Representation

### Draft Modification Report

#### 0463S - Recognition of the '2nd January' Scottish Bank Holiday as a Business Day for Supply Point related transactions

**Consultation close out date:** 27 January 2014  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** EDF Energy  
**Representative:** Natasha Ranatunga  
**Date of Representation:** 24 January 2014

#### Do you support or oppose implementation?

Support with comments.

#### Please summarise (in one paragraph) the key reason(s) for your support/opposition.

EDF Energy supports the removal of the 2<sup>nd</sup> January Bank Holiday for SPA system purposes. The removal of this date would eliminate the circumstance where 4 non Business Days could exist within a consecutive 21 calendar day period and would ensure that Suppliers have a minimum of 3 Business Days to respond to a change of Supplier request.

Furthermore this modification, if implemented would strengthen the switching process without compromising quality of service as the removal of the 2<sup>nd</sup> January Bank Holiday may reduce the risk of erroneous transfers taking place which require corrective actions at a later date.

#### Are there any new or additional issues that you believe should be recorded in the Modification Report?

No.

#### Self Governance Statement:

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

We agree with the Modification Panel's decision that this modification proposal should be subject to self-governance.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

EDF Energy agrees with the points made in the modification proposal.

#### Impacts and Costs:

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*What analysis, development and ongoing costs would you face if this modification were implemented?*

If this modification were implemented, Users would no longer be required to modify their systems and processes to take account of the 2<sup>nd</sup> January Bank Holiday following receipt of Xoserve's update to the standing data table.

**Implementation:**

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

EDF Energy would support the implementation of this proposal as soon as possible particularly as system changes are not required. Confirmation that implementation will take place prior to 2<sup>nd</sup> January 2015 would provide certainty to EDF Energy particularly as our internal process to take into account of this Bank Holiday begins in advance of this date.

**Legal Text:**

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

We are satisfied that the majority of the proposed legal text amendments will deliver the intent of the modification.

However, there are proposed changes to the following paragraphs of TPD Section G: 6.2.2(a), 6.3.7, 6.6.7 (b) and 6.6.13(a) which do not appear to enhance the process to meet the 21 day switching target, it appears to go over and above the purpose of the modification proposal which is to simply change system processing capability to enable SPA and RGMA flows to take place on the 2<sup>nd</sup> Bank Holiday within January.

Paragraph 6 of TPD Section G contains provisions in relation to the interruption process. Consequently, EDF Energy believes that changes to these specific paragraphs detailed above should not be made.

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

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*

No.