

Joint Office

Enquiries@Gasgovernance.co.uk

11 July 2019

Dear Sir or Madam,

Re: UNC 0682 Market Participant MDD Migration to UNC Governance from the SPAA

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

NGN supports this Modification.

Reasons for Support/Opposition:

We support this modification as it will facilitate Ofgem's recommendation, as part of the development of the new Retail Energy Code (REC), for the Central Data Services Provider (CDSP) to manage the Market Participant MDD (Market Domain Data) Process under the Data Services Contract (DSC) area of the Uniform Network Code (UNC). We agree that it should follow Authority Direction procedures due to the cross-code coordination required to transfer the existing process out of the SPAA, and into the UNC.

Implementation:

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

We believe that the implementation of this modification should align with both the Xoserve change proposal, XRN4851: 'Moving Market Participant Ownership from SPAA to UNC/DSC' and SPAA change SCP467: 'Market Participant MDD Migration to UNC Governance' to ensure a smooth transition between codes.

Impact and costs:

What analysis, development and ongoing costs would you face if this modification were implemented?
None identified.

Legal Text:

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

We agree that the legal text provided should deliver the solution outlined in the modification.

Please note 6.1.3 (a) (b) (g) should be amended to consistently describe the licence holder using the same language style, particularly identifying Suppliers as licence holders.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree that the movement of the MDD Process from SPAA into UNC Governance would further Relevant Objective f) *promotion of efficiency in the implementation and administration of the Code.*

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Are there any errors or omissions in the Modification Report?

None identified.

Any additional analysis or comments?

None.

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 (Industry Codes)
Mobile: 07580 215 743

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