

## Representation - Draft Modification Report UNC 0682

### Market Participant MDD Migration to UNC Governance from the SPAA

Responses invited by: **5pm on 11 July 2019**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Richard Pomroy
<b>Organisation:</b>	Wales & West Utilities Ltd
<b>Date of Representation:</b>	3 <sup>rd</sup> July 2019
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	f) Positive

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

We support this proposal which brings governance of Market Participant id under UNC governance.

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

As Ofgem has “called in” this proposal to enable coordination across Codes we support an implementation date determined by Ofgem to ensure that the Market Participant ids migrate in time to support the delivery of the Faster and More Reliable Switching programme.

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

WWU will face no costs.

Currently changes in Market Participant ids in gas are governed by the SPAA change board. We understand that until all the provisions of SPAA, in particular the Master Domain Data, are migrated into REC then the proposal is that where there are any changes to the Market Participant ids then the DSC Contract Committee will convene a meeting on the same day as the SPAA Change Board to approve these changes. This will require members of the DSC Contract Committee to dial into this meeting. The alternative is for these changes to be considered by the regular monthly meeting of the DSC Contract Committee and for interested parties to dial into that meeting.

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

Yes.

The legal text provider questioned whether transitional text was required to specifically state that the Market Participant ids held by SPAA would be adopted when they came under UNC governance. We understand from the CDSP that the proposal is to reconcile the list held by the CDSP with the list held by SPAA. Given this it seems reasonable to rely on the proposed text in GT D 6.2.1 and treat the Market Participant ids held by SPAA as being assigned by the CDSP on implementation of this proposal. In this context “from time to time” would be the date of implementation.

**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**