## Representation – Draft Modification Report UNC 0841 Introduction of cost efficiency and transparency requirements for the CDSP Budget

Responses invited by: 5pm on 07 March 2024

To: enquiries@gasgovernance.co.uk

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

Representative:	Charlotte Gilbert
Organisation:	BUUK
Date of Representation:	07/03/2024
Support or oppose implementation?	Support
Relevant Objective:	<ul><li>c) Positive</li><li>d) Positive</li><li>f) Positive</li></ul>
Relevant Charging Methodology Objective:	Not Applicable

**Reason for support/opposition:** Please summarise the key reason(s) for your support or opposition.

BUUK support this Modification. We believe that it will allow us and other DSC parties to review Business Plan proposals on their efficiency and whether expenditure proposed is economic and therefore value for money. This greater detail in expenditure allows for more transparency and granularity which we agree will result in more accurate forecasts of charges. The changes proposed in this Modification will ultimately allow for parties to be able to govern CDSP more efficiently, as described in Code.

For these reasons we believe this Modification has a positive effect on Relevant Objects c), d) and f).

**Governance Statement:** Please provide your views on the self-governance statement or reasons why Authority Direction should apply.

We agree with the materiality statement that this Modification should be subject to Authority Direction.

Impacts and Costs: Please provide a view on the impacts and costs you would face.

Cost indicated through the ROM published by the CDSP range between £45,000 - £70,000 which will be split between DSC parties which would mean a minimal impact.

## Joint Office of Gas Transporters

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

We believe that this Modification should be implemented as soon as possible to align with the upcoming work on Business Plan 2025/26.

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

We have reviewed the legal text are satisfied it will deliver the intent of the Solution.

Panel Questions: Panel Members have requested that the following questions are addressed.

No questions were raised but the Panel have asked respondents to note that Modification 0841A was raised as an alternative to Modification 0841 on 27 September 2023 and was withdrawn on 26 January 2024. The information is available with all of the other 0841 documentation, as normal.

https://www.gasgovernance.co.uk/0841

BUUK are aware of the withdrawal of 0841A.

**Error or Omissions:** Are there any errors or omissions in this Modification Report that you think should be taken into account? *Please include details of any impacts/costs to your organisation that are directly related to this.* 

N/A

Additional analysis: Please provide below any analysis or information to support your representation.

N/A