

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:	Sally Hardman
Organisation:	Scotland Gas Networks and Southern Gas Networks
Date of Representation:	6 th March 2024
Support or oppose implementation?	Support
Relevant Objective:	c) Positive d) Positive f) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

SGN supports the intent of Modification 0841 to facilitate an increased transparency in the Central Data Service Providers (CDSP) Data Services Contract (DSC) Business Planning cycle and the charging structure within it.

This modification will be placing a minimum level of transparency upon the CDSP by the additional steps set out within the Business Plan Information Rules (BPIR) providing DSC Parties with the ability to scrutinise the Business Plan as provided in BPIR 3. Publication of material.

The provision of financial performance year on year will provide additional clarity and context enabling DSC Parties to clearly understand the drivers and challenges placed upon the CDSP to deliver its services as set out in BPIR 4. b. Current performance.

This provides by no means a conclusion to the development of the annual Business Planning cycle but a baseline for further progress and improvements as is provided in BPIR 2. Amendment therefore facilitating both relevant objective d) Securing of effective competition and f) Promotion of efficiency in the implementation and administration of the Code.

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

In our opinion Authority Direction should apply due to the appeals process set out in the Data Service Contract.

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

The Assurance activities set out in Business Rule 5 provides the potential for additional costs to be incurred by industry parties if the DSC Contract Committee so choses to instruct a third party to carry out this activity.

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

Our expectation is that the change will be implemented in time to support the 2025/26 Xoserve Business Plan which commences with industry engagement in July 2024.

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

SGN is satisfied that the legal text delivers 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>

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.*

None identified.

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

Nothing to add.