

## Representation - Draft Modification Report UNC 0825

### Removal of the remaining Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements put in place under Modification 0434

Responses invited by: **5pm on 10 August 2023**

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>	Alex Cebo
<b>Organisation:</b>	EDF
<b>Date of Representation:</b>	10/08/2023
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

As the proposer, EDF supports the implementation of this Modification Proposal.

The Modification proposes the removal of the arrangements for retrospective asset adjustments introduced under Modification 0434 and subsequently amended under Modification 0651 following the cost and benefit re-assessment in the context of the changing industry landscape.

The Modification recognises the changes in industry landscape (the introduction of Retail Energy Code and Performance Assurance Board) as well as the industry progress made in the smart metering rollout since the decision to approve the Modification 0651 which result in the original solution no longer deemed to delivering the anticipated benefits.

It also acknowledges the length of time it is taking to implement the solution which following assessment is no longer deemed efficient on the cost basis to implement which resulted from the design complexities industry parties faced around defining the appropriate solution at the initial stages of the development.

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

We support the implementation date.

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

There are no costs associated with this change.

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

We are happy with the legal text and that it reflects the changes proposed.

**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 errors or omissions identified in the legal text.

**Please provide below any additional analysis or information to support your representation**

No further comments.