

Representation – Modification UNC 0658 (Urgent)

CDSP to identify and develop improvements to LDZ settlement processes

Responses invited by: 5pm on 18 June 2018

To: enquiries@gasgovernance.co.uk

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities Ltd
Date of Representation:	18 th June 2018
Support or oppose implementation?	Comments
Relevant Objective:	d) Positive

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

We do not believe that this modification is required; however we support what it proposes and understand why it was raised. The reason it is not required is that the Central Data Service Provider (CDSP) has moved very quickly to facilitate raising a change proposal and the Data Services Contract (DSC) Change Committee approved XRN4695 “Investigating Causes and Contributors to Levels and Volatility of Unidentified Gas”, during the consultation period for this modification. The effect of the modification would be to increase the priority of the DSC change but this is already being given high priority by the CDSP. In the light of this we suggest that the proposal should be withdrawn.

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

Immediately following an Ofgem direction.

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

None for WWU, the DSC change will be funded by Shippers.

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

There is no UNC legal text although there is legal text to change the Data Services Contract which can be done by UNC modification. Nevertheless this will be accomplished by the aforementioned DSC change.

Are there any errors or omissions in this Modification 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

No