

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:	John Welch
Organisation:	npower
Date of Representation:	18/06/2018
Support or oppose implementation?	Comments
Relevant Objective:	d) Positive

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

Given the continuing UIG issues experienced by all shippers, npower supports the intent and desired outcome of the modification proposal, but we are unconvinced that a modification is required in this instance. We note that the CDSP has now created a change proposal for focussed work of this type, and this has been discussed in the DSC Change Management Committee. Given that the modification proposal allows a degree of flexibility for the CDSP to undertake this work, it's not clear that anything additional would be gained by altering the CDSP Service document through UNC modification to allow this work to go ahead.

We believe that the existing DSC service structure will allow the CDSP to undertake this work, with any third party support it feels is necessary, and with the appropriate degree of industry visibility and scrutiny. Although we are uncertain that this modification is needed at the current time, we support the aims of the proposal and welcome the activity and discussion that the modification proposal has generated.

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

We would like to see the work commence as soon as is practical.

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

Additional shipper costs through the DSC route, which we believe can be assessed and scrutinised through the relevant forums.

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

Yes.

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.*

None.

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

None submitted.