

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:	Andrew Green
Organisation:	Total Gas & Power Ltd
Date of Representation:	18 th June 2018
Support or oppose implementation?	Support
Relevant Objective:	d) Positive or other Relevant Objectives/None

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

UIG is a very significant issue for shippers and consumers and this proposed approach would give a more co-ordinated and focussed approach to identifying and proposing solutions to improve the situation. It is an enabling modification to provide the CDSP with the mandate and appropriate funding and so we believe it could be implemented fairly quickly to allow the identification of issues and solutions as soon as possible. The modification does not impact the progression of any existing modifications and may give rise to new modifications to effect improvements and therefore does not bypass established industry processes.

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

TGP would like to see this implementation ASAP as there are very significant industry costs associated with high and volatile UIG.

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

It is impossible to say as we don't know what the CDSP is going to ask of suppliers but we do not anticipate the costs to be significant in comparison with industry costs associated with UIG

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.*

No

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

We appreciate that this modification solution is also progressing through the DSC Change Management Committee route and should it reach an equivalent and successful conclusion through that route sooner than this modification is implemented, then TGP (as proposer) would consider withdrawing this UNC modification as it would no longer be necessary.