

Representation - Draft Modification Report UNC 0651 Changes to the Retrospective Data Update provisions

Responses invited by: **5pm on 09 August 2018**

To: enquiries@gasgovernance.co.uk

Representative:	David Mitchell
Organisation:	Scotland and Southern Gas Networks
Date of Representation:	9 th August 2018
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

SGN supports this modification proposal as it provides a positive and pragmatic means of retrospectively updating data held by the CDSP. We agree with the proposer's view that this modification is needed due to a period of 4 years elapsing since the development of 0434 "Project Nexus – Retrospective Adjustment". We believe that 0651 has been carefully considered and developed by industry parties following the 0624R "Review of arrangements for Retrospective Adjustment of Meter Information, Meter Point / Supply Point and Address Data", this review group looked at several options for addressing retrospective data updates therefore we believe all options have been considered by industry parties. The option 4 solution that has been developed in 0651 can be implemented within the shortest timescale at the least cost, which we feel is a major benefit and will have less impact on other high priority changes such as Faster Switching. Additionally, 0651 in our opinion will have less impact on systems than the 0434 proposals and should therefore be implemented.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

We agree that this modification proposal does not fulfil the requirements to be a self-governance modification. This modification is likely to have an impact on customers as it amends some of the proposals that were due to be implemented as part of 0434 which had an authority determination.

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

The implementation lead time should be led by the DSC Change Committee and Xoserve.

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

No impacts or changes to SGN's internal systems have been identified however we will be funding a proportion of the costs of changing the CDSP's systems.

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 Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

None identified

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

N/A