

## Supplemental Representation

### 0353 - Population and Maintenance of the Market Sector Code within the Supply Point Register

**Consultation close out date:** 01 July 2011  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** EDF Energy  
**Representative:** Stefan Leedham

#### Do you support or oppose implementation?

Oppose

#### Has your support/opposition changed as a result of the issues raised in this further consultation?

Yes

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

We support the intent of the proposal to ensure that the blank MSCs are populated, however, we have concerns with the risks presented by this specific proposal with regards to dual governance. At the time of responding we felt that the risk from dual governance might be an issue in the future as obligations to populate and maintain the MSC would sit within both the Supplier Licence and the UNC going forward. However, as Ofgem has identified, the risks from dual governance are present today with different requirements contained in the Supplier Licence and UNC. This would appear to make the mod un-implementable at this time and consideration should be given to varying or replacing the modification so that there was only an obligation to populate blank MSCs.

#### Are there any additional issues that you believe should be recorded in the Supplemental Report?

At the UNC Panel on 16 June 2011, Ofgem indicated that they would appreciate views from Shippers as to whether the solution to the issue was for Shippers to hold two databases containing a UNC defined MSC and a Supply Licence defined MSC. The ability to have a site defined as I&C under the Supply Licence and Domestic under the UNC does not appear appropriate and should not be allowed to occur as this might create added complexity and confusion. We therefore do not support the view that this proposal could be implemented with a work around implemented at a later date.

We also note that the cost of holding two databases, one for Supply Licence requirements and one for UNC requirements, would appear hugely inefficient and costly – going against relevant objective A11.1 (c). The financial cost of this is likely to be high. We would require two databases – one for UNC requirements and one for Supply Licence requirements, and a system to be able to identify which definition was appropriate for specific processes. A simpler solution would be to raise and implement a modification proposal that did not introduce this dual governance issue.