

## Representation - Draft Modification Report 0565 0565A 0565B

### Central Data Service Provider: General framework and obligations

Responses invited by: **5pm 08 December 2016**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Azeem Khan
<b>Organisation:</b>	Npower Limited
<b>Date of Representation:</b>	08/12/2016
<b>Support or oppose implementation?</b>	0565 - Oppose 0565A - Support 0565B - Oppose
<b>Alternate preference:</b>	<i>If either 0565, 0565A or 0565B were to be implemented, which would be your preference?</i>  0565A
<b>Relevant Objective:</b>	<b>c)</b> Positive  <b>d)</b> Positive  <b>f)</b> Positive

*Please note that due to the number of documents required the 'Supporting Business Documentation' page has been linked to the main modification page, which includes the legal drafting as follows:*

*CDSP/DSC Draft for Consultation: <http://www.gasgovernance.co.uk/0565/DSC> (CDSP and DSC documents)*

*UNC Draft for Consultation: <http://www.gasgovernance.co.uk/0565/UNCdrafting> (UNC Legal Text)*

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

Npower Limited supports Modification 0565A, as we believe that it is in line with the spirit of Xoserve's Funding, Governance and Ownership (FGO) programme with no imbalance of power between any of the signatories to the Data Services Contract. We do not support Modification 0565 nor 0565B, as there is a risk that shippers will be out-voted by DNOs where shippers and transporters run the risk of their views becoming marginalised and decisions imposed unilaterally. Modification 0565A allows for equal representation and avoids this risk.

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

Npower Limited agrees that these modifications should not be subject to self-governance as they are expected to have a material impact on the contractual relationships between UNC parties, including the establishment of the CDSP and DSC arrangements.

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

Npower Limited would like for the modification to be implemented in time so that it is effective from 1<sup>st</sup> April 2017 to comply with the proposed Transporter Licence changes.

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

Npower Limited believes that these modifications propose significant changes to the current UNC structure, including changes to governance and funding of Xoserve. We believe that the main impacts are restricted to Transporters and Shipper contractual arrangements in particular the committee constitutions for the DSC committees.

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

Npower Limited is satisfied that the legal text will deliver the intent of the Solution.

**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

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

N/A