

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

Representative:	Andy Miller
Organisation:	Xoserve
Date of Representation:	08 December 2016
Support or oppose implementation?	Neutral
Alternate preference:	<i>If either 0565, 0565A or 0565B were to be implemented, which would be your preference?</i> Neutral
Relevant Objective:	c) No view d) No view f) No view

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

Neutral

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

Xoserve agrees that this modification should not be subject to the self-governance rules

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

At least 2 months lead time is required for implementation from the Ofgem decision date. It is therefore important that Ofgem makes its decision no later than end January 2017.

Xoserve, GTs, IGTs, Shippers and the Joint Office need to prepare for the go-live date of 1st April 2017. The activities to be completed include:

- Signature of the DSC;
- Establishment of DSC Committees, including election of Committee members;
- DSC readiness e.g. customers to nominate Contract and Change managers, placing orders for Specific Services and any Additional Services, compliance with credit requirements and readiness to issue, receive and pay invoices;
- Publication of Charging Statements and service charges
- Change Management procedures, including transition of in-flight changes, formats of documents, reporting and publication of documents
- UNC ancillary documents e.g. AUGÉ Guidelines Document, updated to reflect FGO arrangements

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

Ongoing operation of the new funding and governance arrangements is expected to give rise to additional costs for Xoserve associated with contractual and financial governance, as well as at the Xoserve corporate level.

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

Xoserve is satisfied that the legal text will deliver the intent of the solution. There has been a significant effort to ensure the legal text is robust as possible. However, we consider that the time available to prepare the UNC and DSC legal text, the limited time available for industry review and the limited engagement from Shippers means that there may be non-material errors with the legal text.

In the event that there is a discrepancy between the text and the intent of the modification we expect the industry will work collaboratively to resolve the matter.

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.*

The UK Link User Agreement has not yet been completed and is not included in the 565 suite of documents. The UK Link User Agreement is to be completed and consulted upon, via the FGO Workgroup with industry parties, and then for approval via the UNCC process.

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

The development of the UNC modification and DSC represents a major industry-wide change. Work has been progressed in very constrained timescales. Modification 565 was raised in November 2015 for an April 2017 implementation. The structure of the DSC within the UNC framework was agreed at the 6th April 2016 meeting. At this point in time UNC Nexus changes were scheduled for October 2016. In August 2016 it became apparent that Nexus would be scheduled for a 2017 delivery and Ofgem confirmed that FGO would continue to work towards its April 2017 delivery. This required a re-work of the FGO UNC and DSC arrangements to reflect a pre-Nexus implementation.

There has been limited time to prepare documents and limited time for industry participants to review documents and it is likely that the UNC legal text and the DSC will contain some non-material errors. Xoserve expects the industry will work collaboratively to resolve any issues and will do so with full regard to the intentions and spirit of the Ofgem FGO review.