

Joint Office

enquiries@northerngas.co.uk

04 June 2021

Dear Sir or Madam,

Re: 0768 - Retail Code Consolidation Significant Code Review

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

NGN supports this Modification Proposal.

Reason for support/opposition:

Please summarise (in one paragraph) the key reason(s)

This modification introduces the changes to the UNC Modification Rules to facilitate the Cross Code Steering Group (CCSG) permissions and processes. The CCSG changes are being introduced across a number of codes to improve governance arrangements to facilitate modification proposals with impacts to other codes. This is required as part of Retail Energy Code (REC) V2, Retail Code Consolidation (RCC) to better facilitate REC V3, Faster Switching, due to be implemented in June 2022. This modification should ensure that the UNC is aligned with the wider code landscape and therefore furthers Relevant Objective f) *the promotion of efficiency in the implementation and administration of the Code.*

Implementation:

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

As this is a Significant Code Review Modification Proposal, we agree that the Authority direct the implementation date in accordance with the Code Modification Rules, and as yet this date has not been set, however we expect it to be prior to the Retail Code Consolidation implementation date, which is currently scheduled for 01 September 2021

Impacts and Costs:

What analysis, development and ongoing costs would you face?

NGN has not identified any additional costs as a result of this modification.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the Solution?

We believe the legal text meets the intent of the Solution. We note that Ofgem has worked with industry to refine the CCSG changes, and subsequent legal text following feedback, and that this is reflected in this version of the legal text.

We note that some following paragraph 15.3 could potentially result in ambiguity and therefore suggest the following revision (shown change marked) to clarify. *Where the Cross-Code Steering Group determines in relation to a Cross-Code Change ~~the~~ this Code is the principal Energy Code:*

Smell gas?

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Service on 0800 111 999

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Colton, Leeds LS15 8TU

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the network**

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

None.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Tracey Saunders (via email)
Market Services Manager (Industry Codes)
Mobile: 07580 215 743

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