Representation - Draft Modification Report UNC 0804

Consequential UNC changes for Switching SCR (REC 3.0)

Responses invited by: 5pm on 01 April 2022

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities
Date of Representation:	1 st April 2022
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

We support implementation because this modification will align the UNC to the Retail Energy Code (REC) v3.0 and make the necessary consequential changes to the UNC due to faster switching becoming Supplier rather than Shipper centric for most Supply Points. This modification therefore furthers relevant objective (f) *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?

This modification is subject to Authority Determination and hence the implementation date is for the Authority to determine; however our view is that implementation should be on the CSS Go Live Date (as defined in the REC), which is currently expected to be 18 July 2022.

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

WWU will have to absorb some additional operating costs due to the changes implemented.

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.

No

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