

SEFE Energy Representation Draft Modification Report

Modification 0811S - Shipper Agreed Read (SAR) exceptions process

1. **Consultation close out date:** 10th January 2023
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:**
SEFE Energy
5th Floor
8 First Street
Manchester
M15 4RP
4. **Representative:**
Steve Mulinganie
Regulation Manager
stevemulinganie@sefe-energy.com
0799 097 2568
5. **Date of Representation:** 30th December 2022
6. **Do you support or oppose Implementation:**
We **Support** implementation of the Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
The current process does not provide a remedy should a party fail to act in accordance with the existing process. We raised this modification to introduce an exceptions process that addresses these circumstances.
8. **Are there any new or additional Issues for the Modification Report:**
No
9. **Self-Governance Statement Do you agree with the status?**
Yes - as this is an exceptions process
10. **Relevant Objectives:**
How would implementation of this modification impact the relevant objectives?
We raised the Modification, and we believe the Modification furthers Relevant Objective d) Securing of effective competition: (i) between relevant shippers and (ii) between relevant suppliers as it provides an exception process to ensure that energy is correctly reconciled between parties.

We note that **no Workgroup Participants raised any objections** to the argument put forward above.

We believe the Modification is also positive in relation to relevant objective f) Promotion of efficiency in the implementation and administration of the Code as currently some Shipper Agreed Reads are not being actioned in a timely and efficient manner and this proposal will address those situations by providing a suitable remedy.

We also note some Workgroup Participants agreed as this could enable settlement to work faster, this Modification could also help to improve Shipper's read performance (once initial reads are accepted, other reads can flow in behind).

We note again that **no Workgroup Participants raised any objections** to the argument put forward above

11. Impacts & Costs:

What analysis, development and on-going costs would you face if this modification was implemented?

We **have not** identified any significant costs associated with the implementation of this modification

12. Implementation:

What lead times would you wish to see prior to this modification being implemented, and why?

We note the Workgroup discussions around implementation and in particular the consequential system changes impacting the CDSP which mean it would be best aligned with a Major System Release. Taking into account this constraint we would be looking at this being delivered as soon as reasonably practicable.

13. Legal Text:

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

We have reviewed the Legal Text provided and have no further comments

14. Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or you wish to emphasise.

No