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3rd August 2023
Your Reference: UNC Modification Proposal 0825

UNC Modification Proposal 0825 – Removal of the remaining Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements put in place under Modification 0434

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal to which Cadent supports.

Do you support or oppose implementation?

Support

Relevant Objective:

f) Positive

Reason for support/opposition:

The arrangements for retrospective adjustment of asset and Supply Point information (RAASP) were originally put in place under Modification 0434. Since this time, the arrangements have been deferred, reviewed and amended a significant number of times. This has been as a result of the difficulty parties have identified in designing an appropriate, beneficial solution which is cost effective.

It has become clear over time that given alternative solutions (including those identified by the proposer as justification for the Relevant Objectives), and the cost, and impact to all parties systems and processes of implementing retrospective arrangements, that it is the time to completely remove the retrospective arrangements put in place by 0434 and subsequently amended by 0651.

Workgroup also agreed that given the length of time it is taking to implement a viable solution, and given that industry has so far managed without the original perceived benefits RAASP may have afforded, that it now appears inefficient on a cost basis to implement.

This modification, if approved will remove from UNC all of the RAASP elements of 0434 and will disapply the implementation of 0651.

Implementation

We agree with the proposer that implementation should be as soon as possible following Authority Direction.

Impacts and Costs

Implementation of the modification will ensure time, effort and expenditure (from all industry parties) to put in place retrospective arrangements will not be required.

Legal Text

We are happy that the legal text provides the intent of the modification.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

No such errors or omissions identified.

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

Nothing further to add.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 07884 113385 (andy.clasper@cadentgas.com) should you require any further information.

Yours sincerely,

Andy Clasper