

Joint Office

Enquiries@gasgovernance.co.uk

10th August 2023

Dear Joint Office,

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

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

This modification includes removal of the changes introduced by Modification 0651 *Changes to the Retrospective Data Update provisions, which was approved in March 2019*. Since then the CDSP has performed a proof of concept which showed that the implementation of the solution would have a minimal impact, whilst the cost of implementation considerable, we do not believe this to be an economic and efficient use of CDSP resources. Additionally the changes contained within 0651 regarding consumption adjustments already exist. Therefore as approval of 0825 would remove the obligation and consequentially the required system changes it would appear positive for Relevant Objective f) *Promotion of efficiency in the implementation and administration of the Code*.

Implementation:

As this is Authority Direction, it should be implemented on a date as directed by the Authority.

Impacts and Costs:

Any residual budgetary value would be returned to Transporters and would therefore be taken into account by future pricing.

Legal Text:

As the 0651 legal text has not yet been implemented, the removal of this is actually included in the solution, but rather Ofgem are requested in their decision letter to confirm that they also approve the non-implementation of modification 0651.

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

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

Mobile: 07580 215 743

Smell gas?

Call the National Gas Emergency

Service on 0800 111 999



1100 Century Way
Thorpe Park Business Park
Colton, Leeds LS15 8TU



0113 397 5300



northerngasnetworks.co.uk

**we are
the network**