

## Representation - Draft Modification Report UNC 0825

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

Responses invited by: **5pm on 10 August 2021**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Sally Hardman
<b>Organisation:</b>	Scotland Gas Networks Ltd and Southern Gas Networks Ltd
<b>Date of Representation:</b>	10 <sup>th</sup> August 2023
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

SGN offers its support for this modification. We agree with the overall objective to remove the retrospective element introduced by Modification 0434 Retrospective Adjustment of Asset and Supply Point information (RAASP). The implementation of Modification 0651 to realise the intent of Mod0434 has been deferred due to various industry wide Project's and the underlying complexity of a cost-effective solution to industry parties.

The modification supports Relevant Objective f) by acknowledging the progress made across industry codes and Smart Metering provisions. With progress made across industry in the interim without Modification 0651's retrospective solution it negates the need to implement a design which is both cost prohibitive and inefficient.

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

We support the proposer's position regarding implementation that this should be as soon as possible following Authority Direction.

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

SGN's expectation is that the implementation of this modification will lead to a saving in central system changes and associated costs to industry parties by negating the need to provide retrospective arrangements.

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

SGN are satisfied that the legal text will facilitate the removal of the retrospection element put in place under Modification 0434.

Additionally, our expectation if approved by the Authority this modification will remove the unimplemented legal text and requirement to implement Modification 0651.

**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 that we have identified.

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

None.