

## SEFE Energy Representation Draft Modification Report

### Modification 0855 - Settlement Adjustments for Supply Meter Points impacted by the Central Switching System P1 Incident

1. **Consultation close out date:** 12<sup>th</sup> October 2023
2. **Respond to:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)
3. **Organisation:**  
SEFE Energy  
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4. **Representative:**  
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0799 097 2568
5. **Date of Representation:** 11<sup>th</sup> October 2023
6. **Do you support or oppose Implementation:**  
We **Support** implementation of this Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**  
We sponsored Modification 0855 on behalf of Xoserve (Central Data Service Provider - CDSP) to implement the agreed industry solution for the settlement discrepancies that arose as a result of the Central Switching Service (CSS) Operator (DCC) P1 incident.  
  
The Modification reflects consensus reached at the relevant industry meetings (Data Communication Company CSS P1 meetings and CDSP daily meetings etc.) as to the preferred approach to address the settlement risk arising from the implementation of the P1 solution (Option 2 by) the Switching Operator. These proposals were further refined as part of the Modification Workgroup development process.
8. **Are there any new or additional Issues for the Modification Report:**  
**No**

## 9. Self-Governance Statement Do you agree with the status?

**Not Applicable**

## 10. Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

As the proposer **we believe that this modification is positive in respect of Relevant Objective (f)** as it allows the CDSP to undertake Settlement Adjustments as required therefore this further promotes the efficiency of industry processes.

## 11. Consumer Benefits:

*Do you have any comments on the Consumer Benefits?*

As the proposer **we believe that this modification is positive** in respect of: -

### **Improved safety and reliability**

Misalignment between Registration and Settlement could lead to a number of industry processes being adversely impacted. Further impacts could be identified should an emergency situation arise if the Shipper has been prevented from updating consumer contact details as they were not recorded as the Registered User.

### **Improved quality of service**

This process should reduce the risk of protracted Settlement uncertainty as a result of the CSS P1 Incident. This should limit the risk to consumer billing – whilst not mitigating this entirely, it is still considered positive in relation to the consumer experience without the greater level of Settlement certainty that this Modification affords.

## 12. 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

It should be noted that should Modifications 0836S and 0855 be implemented, the costs in the ROM for this Modification would supersede and not be additional to the costs identified in the ROM for Modification 0836S - Resolution of Missing Messages following Central Switching Service implementation and integration with REC Change R0067

We would also note that the technical solution for this modification would endure and be available should we encounter similar issues in the future.

### 13. Implementation:

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

Given the potential material Settlement implications leading to uncertainty for consumer billing, it is requested that this **implementation date is as soon as reasonably practicable**.

### 14. Legal Text:

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

We note that the **workgroup has considered the Legal Text and Commentary and is satisfied** that it meets the intent of the Solution

### 15. Modification Panel Questions:

*Do you have any comments on any questions raised by the Modification Panel?*

We note the Workgroup response and have **no further comments**

Q1. Is the impact of the P1 incident on Shipper's material if customers retained or lost are netted off.

Ans. It was noted that although the analysis might prove beneficial for some parties when considering the materiality of the issue being resolved by the Modification, the CDSP would only be able to provide netting off values based on estimated reads. Therefore, these would be difficult to draw conclusions against as actual reads provided later might significantly change the values provided in the analysis. It was noted that parties have been provided with estimated reads for their portfolios and could undertake their own analysis.

### 16. Performance Assurance Considerations:

*Do you have any comments?*

If implemented, this Modification should reduce the risk of protracted Settlement uncertainty as a result of the CSS P1 Incident.

### 17. 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**