

Representation – Draft Modification Report UNC 0841
Introduction of cost efficiency and transparency requirements for the
CDSP Budget

Responses invited by: 5pm on 07 March 2024

To: enquiries@gasgovernance.co.uk

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

Representative:	Andrew Eisenberg
Organisation:	E.ON
Date of Representation:	07/03/2024
Support or oppose implementation?	Support
Relevant Objective:	c) Positive d) Positive f) Positive
Relevant Charging Methodology Objective:	Not Applicable

Reason for support/opposition: *Please summarise the key reason(s) for your support or opposition.*

We support the modification and believe the greater transparency from, and scrutiny of, the CDSP is a fundamental necessity in mitigating the consequences of an appointed monopoly, bringing governance more in line with arrangements for other monopoly providers.

Governance Statement: *Please provide your views on the self-governance statement or reasons why Authority Direction should apply.*

We agree the modification should be subject to Authority decision.

Impacts and Costs: *Please provide a view on the impacts and costs you would face.*

No direct impacts. Any (minimal) CDSP cost impacts are mitigated by potentials arising from greater business plan scrutiny.

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

As soon as possible, for BP25/26.

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

Yes

Panel Questions: *Panel Members have requested that the following questions are addressed.*

No questions were raised but the Panel have asked respondents to note that Modification 0841A was raised as an alternative to Modification 0841 on 27 September 2023 and was withdrawn on 26 January 2024. The information is available with all of the other 0841 documentation, as normal.

<https://www.gasgovernance.co.uk/0841>

Error or Omissions: *Are there any errors or omissions in this Modification Report that you think should be taken into account? Please include details of any impacts/costs to your organisation that are directly related to this.*

N/A

Additional analysis: *Please provide below any analysis or information to support your representation.*

N/A