

Representation - Modification UNC 0666 (Urgent)

Establishment of a CSS Bid Group for CDSP central switching system bid activities

Responses invited by: **5pm on 06 September 2018**

To: enquiries@gasgovernance.co.uk

Representative:	Phil Lucas
Organisation:	National Grid
Date of Representation:	6 th September 2018
Support or oppose implementation?	Qualified Support
Relevant Objective:	d) Positive

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

National Grid supports the proposed measure to facilitate the development of an Xoserve bid to provide Centralised Switching Service (CSS) for the gas and electricity markets. However, this support is qualified to the extent that the bid activities do not adversely impact or increase the risk to effective delivery of existing services it provides as the Central Data Services Provider. Notwithstanding this caveat, we agree that implementation would better facilitate relevant objective (d) by expediting an Xoserve bid for provision of the CSS.

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

There are no direct impacts on National Grid and therefore we do not require any lead time for implementation.

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

Recognising that the CSS bid is a shipper funded activity, we do not anticipate that National Grid will incur any direct analysis, development or ongoing costs.

Given the extent and scope of work (and resource) likely to be required to deliver a robust bid for the CSS in the prescribed timescales, we are unclear on the impacts that this may have on delivery of existing CDSP services in the interim period. Any adverse impacts on the delivery of such services may impact National Grid and impose cost and risk on us, hence this is the basis of the qualification of our support.

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

National Grid is satisfied that the legal text delivers the intent of the solution.

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

We have not identified any such errors or omissions.

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