

Representation - Draft Modification Report UNC 0824 (Urgent)

Appointment of CDSP as the Scheme Administrator for the Energy Price Guarantee (EPG) for Domestic Gas Consumers (Gas)

Responses invited by: **12 noon on 21 September 2022**

To: enquiries@gasgovernance.co.uk

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

Representative:	Claire Louise Roberts
Organisation:	ScottishPower
Date of Representation:	21/09/22
Support or oppose implementation?	Support
Relevant Objective:	d) Positive e) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

We support the solution and would call for discussions on reconciliation to take place as soon as possible.

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

Due to the urgency of this modification, we agree this can be implemented on a date instructed by the Authority.

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

The modification is only to set up the scheme administrators there are development costs for us, but due to the significantly reduced timeline we have been unable to impact assess this fully for cost and any consequential impacts.

However, we already recognise the reconciliation will have an impact on us and as such strongly recommend that discussions start as soon as possible.

We would like to note, no costings have been provided within in the modification of what this will cost Shippers because of the CDSP taking on the role as scheme administrator.

The equivalent BSC Electricity modification **P446** provides clear costs for Elexon's to complete this role both administrative and operational costs .c 553k. We would like to see a similar breakdown of costing to understand how much it will cost Shippers to implement this change.

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

No comment

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.*

No comment

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