

Representation - Draft Modification Report UNC 0651 Changes to the Retrospective Data Update provisions

Responses invited by: **5pm on 09 August 2018**

To: enquiries@gasgovernance.co.uk

Representative:	Carl Whitehouse
Organisation:	First Utility
Date of Representation:	9 August 2018
Support or oppose implementation?	Oppose
Relevant Objective:	d) Negative

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

A suite of UNC modification proposals were approved for implementation during 2014 to replace an aging UK Link system. It was recognised at the time that the wholesale replacement of systems presented an opportunity to incorporate enhancements to industry processes. The key elements of UNC 0434 was to enable Shippers to proactively make address amendments, update meter asset data and replacement of meter readings to then automatically calculate financial adjustments.

This modification proposes changes to the agreed retrospective solution while also incorporating a one-off data cleanse activity following development of UNC Workgroup 0624R. The views of attendees within this workgroup were polarised with Shippers preferring the agreed UNC 0434 approach and Distribution Network Operators preferring a de-scoped option. We determine that those polarised views of the workgroup do not substantiate the claims for raising this modification proposal.

A data cleanse exercise will provide resourcing challenges to Shippers in addition to the manually intensive processes they face today as a result of not having automated retrospective functionality. The data cleanse activity will also affect the CDSP as a result of manually processing financial adjustments. Finally, a data cleanse exercise conducted in 2019 will arguably not mean that industry data is cleansed for delivery of Faster & More Reliable Switching currently expected for 2021.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

There is a material impact of this proposal so we would expect an Authority decision.

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

We would expect the DSC Change Committee to decide on implementation timescales if approved.

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

We would expect to encounter additional costs in engaging with a data cleanse exercise along with the costs of processing manual retrospective updates.

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

Yes

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

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