

## Representation – Modification UNC 0658 (Urgent)

### CDSP to identify and develop improvements to LDZ settlement processes

**Responses invited by: 5pm on 18 June 2018**

**To:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Gavin Anderson
<b>Organisation:</b>	EDF Energy
<b>Date of Representation:</b>	18.06.2018
<b>Support or oppose implementation?</b>	Support/Oppose/Qualified Support/Comments * <i>delete as appropriate</i>
<b>Relevant Objective:</b>	<b>d) Positive/Negative/None* <i>delete as appropriate</i></b>  <b><del>or other Relevant Objectives</del> Positive/Negative/None* <i>delete as appropriate</i></b>

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

EDF Energy supports this modification due to the ongoing level, volatility and unpredictability of Unidentified Gas (UIG) which causes considerable commercial difficulty to Shippers.

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

We recommend this is implemented as soon as reasonably possible as we see the benefits of a new, centralised and more focused approach, where the Central Data Services Provider (CDSP) empowered to take on a leadership role on behalf of the industry. This would then enable the CDSP through the implementation of a task force to proactively address the problem in a more controlled manner.

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

We do not see any direct costs as a consequence of this modification. However, as the task force identifies possible changes, this may result in costs, where impacted parties should be consulted using the current processes.

While this modification does not directly carry costs the additional service line within the DSC will be funded according to the DSC rules, therefore leading to increased Shipper

costs. EDF Energy welcomes the work from the CDSP, however, based on discussions at Change Committee to date we believe any changes are likely to come at significant cost. Therefore, it is vital that changes are subject to the correct governance and address the issues in a positive manner for all parties.

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

Insert Text Here

**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.*

No

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

Insert Text Here