

Representation - Draft Modification Report UNC 0855

Settlement Adjustments for Supply Meter Points impacted by the Central Switching System P1 Incident

Responses invited by: **5pm on 12 October 2023**

To: enquiries@gasgovernance.co.uk

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

Representative:	Edward Allard
Organisation:	Cadent Gas Limited
Date of Representation:	12 th October 2023
Support or oppose implementation?	Support
Relevant Objective:	f) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

Cadent are supportive of this modification as it identifies a process for managing and resolving settlement issues attributed to the disconnect between the CSS and UKL caused by the CSS Priority 1 (P1) Incident in July 2023. We therefore believe that the process identified by modification 0855 will reconcile the correct settlement position for Shippers.

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

We agree with the Proposer that the potential settlement implications caused by the CSS P1 Incident could be material (potentially on gas consumers' billing), and it is therefore Cadent's view that the implementation date should be as soon as reasonably practicable.

Additionally, the solution identified in the UNC Draft Modification Report (BR7) proposes that the CDSP "*will perform the adjustment calculation no earlier than at the end of the third month following issue of the CSS Effective Date Meter Reading to both Shippers, or the implementation Date of the Modification, whichever is the later*", meaning that the impacts of a sub-optimum Modification's implementation date will be mitigated with respect to adjustment calculations.

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

No costs or impacts identified.

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

As Legal Text provider we are satisfied that it meets the intent of the Solution.

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 errors or omissions identified in this modification report

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

Nothing further to add.

We trust that this information will assist in the compilation of the Final Modification Report.

Please contact me on 07891670444 (Edward.allard@cadentgas.com) should you require any further information.