

**Gazprom Energy Representation**  
**Modification UNC 0673 (Urgent) Amendment of UNC and DSC arrangements**  
**to enable Xoserve to bid for and provide CSS Services**

1. **Consultation close out date:** 19<sup>th</sup> November 2018
2. **Respond to:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)
3. **Organisation:**  
Gazprom Energy  
5<sup>th</sup> Floor  
8 First Street  
Manchester  
M15 4RP
4. **Representative:**  
Steve Mulinganie  
Regulation Manager  
[stevemulinganie@gazprom-mt.com](mailto:stevemulinganie@gazprom-mt.com)  
0799 097 2568
5. **Date of Representation:** 19<sup>th</sup> November 2018
6. **Do you support or oppose Implementation:**  
We **Support** implementation of the Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**  
This Modification seeks to put in place arrangements enabling Xoserve to provide the Central Switching Service (CSS) should it be successful in its bid. It should be noted that Shippers have already approved and funded Xoserve's participation in the procurement exercise to date.
8. **Are there any new or additional Issues for the Modification Report:**  
No
9. **Self-Governance Statement Do you agree with the status?**  
NA
10. **Relevant Objectives:**  
*How would implementation of this modification impact the relevant objectives?*  
We **agree** that this modification is positive in respect of Relevant Objective **(f)** in that this modification is the most efficient way of making UNC and DSC changes to meet the required arrangements.

The alternative would be a modification to undo much of the arrangements implemented in 2017 as a result of the Ofgem Funding Governance and Ownership review of Xoserve.

#### 11. Impacts & Costs:

*What analysis, development and on-going costs would you face if this modification was implemented?*

We **have not** identified any significant costs associated with this modification

#### 12. Implementation:

*What lead times would you wish to see prior to this modification being implemented, and why?*

We would wish to see implementation in line with the Urgent Timetable

Process	Date
Workgroup meeting	26 October 2018
Consultation commences	31 October 2018
Consultation closes	19 November 2018
Final Modification Report available for Panel	20 November 2018
Modification Panel recommendation	22 November 2018
Ofgem decision expected by	30 November 2018

#### 13. Legal Text:

*Are you satisfied that the legal text will deliver the intent of the modification?*

We have **no** comments on the Legal Text provided.

#### 14. Is there anything further you wish to be taken into account?

*Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or you wish to emphasise.*

We believe enabling Xoserves (the “CDSP”) ability to participate in broader market developments and opportunities such as the formation of the UIG Taskforce and Central Switching Service is consistent with the aspirations of the Funding Governance and Ownership (FGO) review. Whilst we note some concerns over Xoserve’s ability to continue to discharge some of its customers regulatory obligations we believe that developing a world class Central Data Service Provider able to support different market sectors equitably and effectively will only enhance its overall ability to provide core services by being able to benefit from enhanced economies of scale and access to a broader knowledge base which will arise.