

## Representation - Modification UNC 0673 (Urgent)

### Amendment of UNC and DSC arrangements to enable Xoserve to bid for and provide CSS Services

Responses invited by: **5pm on 19 November 2018**

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

<b>Representative:</b>	John Cooper
<b>Organisation:</b>	BUUK
<b>Date of Representation:</b>	19/11/2018
<b>Support or oppose implementation?</b>	Qualified Support
<b>Relevant Objectives:</b>	<p><b>f)</b> Positive</p> <p><b>d)</b> Positive</p>

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

In general BUUK supports the implementation of this modification and is not against the CDSP bidding and providing CSS services. We were disappointed to see the late notice, urgent status of this modification, this is a significantly complex modification in terms of existing, core service arrangements that Xoserve provide as the CDSP under the DSC. The urgent status means that the modification doesn't benefit from significant and thorough engagement which is ideally required considering these complexities. Nonetheless, without this modification BUUK recognise that Xoserve will be unable to progress to the next stage of the DCC procurement.

However, BUUK draws attention to the need for Xoserve as the CDSP to provide greater assurance around the provision of core CDSP services. The proposal to utilise CDSP governance to form CSS services which will then be separated out into specific CSS services means that these will be distinctly different service areas. BUUK believes that the CDSP needs to be able to demonstrate how it will separate out CDSP services and CSS services.

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

BUUK agrees with the proposed implementation dates.

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

We would expect that any enduring costs associated with the provision of the CSS, as enabled by this modification, be funded by Shipper organisations (under the DSC) and separated away from those costs associated with the provision of CDSP services defined under the DSC.

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

Yes, as long as there is a consistent distinction between CDSP services and CSS Services.

**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.*

None identified.

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

BUUK have the following areas of concern:

1. CDSP resource being diverted away from core provisions of CDSP services as set out in the DSC, to CSS services. This then has the potential for competing priorities for Xoserve and the provision of sub-standard services around query resolution, issue handling, release management and general customer care. BUUK would expect a continuing improvement of current CDSP levels of service and not a deteriorating one.
2. Assurances need to be provided in terms of how Xoserve's operations will be separated to reflect provision of services as the CDSP and as a CSS provider. Enduringly, these CSS Services should be captured outside of the current arrangements that were put in place since Nexus implementation (1<sup>st</sup> June 2017). Funding of these two services will also need to be clearly demonstrated to show that there is no smearing of costs.