

Representation - Draft Modification Report UNC 0824 (Urgent)

Appointment of CDSP as the Scheme Administrator for the Energy Price Guarantee (EPG) for Domestic Gas Consumers (Gas)

Responses invited by: **12 noon on 21 September 2022**

To: enquiries@gasgovernance.co.uk

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

Representative:	Sally Hardman
Organisation:	Scotland Gas Networks Ltd & Southern Gas Networks Ltd
Date of Representation:	21 st September 2022
Support or oppose implementation?	Qualified Support
Relevant Objective:	d) Positive e) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

SGN supports the principle of the Energy Price Guarantee (EPG) schemes intentions to facilitate the reduction of Domestic Consumer Energy Bills in line with Government direction.

Due to the timescales required in this modification we are not in a position to establish the impacts to the Central Data Service Provider (CDSP) and Data Services Contract (DSC) Parties as a result of the proposed changes.

We note the exclusion of the UNC and DSC Committees from any decision making regarding this process to be carried out by the CDSP and note that this should not set a precedent.

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

The implementation is understood to be urgent in nature and therefore the proposed timeline is supported.

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

SGN's internal systems are not impacted by this proposal however we are unable to establish if this will provide any enduring consequential impacts or costs to the services provided by the CDSP.

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

Our legal team are currently reviewing the legal text provided however due to the constricted timeline we are not in a position to provide a detailed response.

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.*

Due to the significantly reduced timeline we have been unable to establish if there are any consequential impacts/costs to this modification.

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

We wish to highlight that the current UNC arrangements do not facilitate the CDSP to engage in non-UNC activities as set out by this modification. At the point of responding to this consultation there is no legislation in place to enable the Department for Business, Energy and Industrial Strategy (BEIS) to directly instruct the CDSP to undertake this process.

The CDSP (Xoserve) are a not for profit organisation and the DSC Terms and Conditions 12.5a Customer Indemnity specifies that all parties are expected to indemnify the CDSP. In the case of this change we understand that the legal text makes an exception and DSC Parties will not be liable, however as above the timescales have not enabled us to undertake a detailed review.