Joint Office of Gas Transporters

Representation - Modification UNC 0666 (Urgent)

Establishment of a CSS Bid Group for CDSP central switching system bid activities

Responses invited by: 5pm on 06 September 2018	
To: enquiries@gasgovernance.co.uk	

Representative:	Sally Hardman
Organisation:	Southern Gas Networks and Scotland Gas Networks
Date of Representation:	6th September 2018
Support or oppose implementation?	Qualified Support
Relevant Objective:	**d)** Positive

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

SGN believe this modification proposal will enable Xoserve as the Central Data Service Provider (CDSP) to participate in the Central Switching Service (CSS) Bid process.

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 existing proposed timeline is supported.

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

We agree that this activity is a restricted class service and as such will be wholly funded by the Shipper community.

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

Whilst we support the restricted class nature of the activities, we do not consider that the legal text sufficiently addresses the associated indemnity arrangements.

The DSC Terms and Conditions 12.5(a) Customer Indemnity specifies that all parties are expected to indemnify the CDSP:

https://www.gasgovernance.co.uk/sites/default/files/ggf/page/2017-07/DSC-TERMS-AND-CONDITIONS.pdf

SGN believes that this service line activity falls outside of the current CDSP permitted services and, given it is a restricted class service in nature, the Indemnity should only refer to the restricted community to which this service line applies.

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

None to add.