

Representation - Draft Modification Report UNC 0708S

Re-ordering of the UNC in advance of Faster Switching

Responses invited by: **5pm on 07 May 2020**

To: enquiries@gasgovernance.co.uk

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

Representative:	Brandon Rodrigues
Organisation:	ESP Utilities Group
Date of Representation:	07/05/2020
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

ESP supports this modification as it seeks to bring clarity to the UNC with respect to changes associated with Faster Switching and improving administration of the code in advance of the implementation of Ofgem's Switching Programme.

Self-Governance Statement: Please provide your views on the self-governance statement.

We agree that this should be a self-governance modification.

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

We agree that the implementation may occur as soon as Panel approval is provided, conditional on the date aligning with the implementation of the equivalent IGT UNC modification (IGT137), to retain clarity and the high quality of administration of both codes within the industry.

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

We would not face any direct costs for implementation of this modification. However, given the cross-code impacts on the IGT UNC, resources will be required to assess the impact and implementation within the IGT UNC to ensure the objectives of the code are met.

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

We are satisfied that the legal text will deliver the solution's intent.

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.*

We have not identified any errors or omissions.

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

No further comments.