

Representation - Draft Modification Report UNC 0651

Changes to the Retrospective Data Update provisions

Responses invited by: **5pm on 09 August 2018**

To: enquiries@gasgovernance.co.uk

Representative:	Graham Wood
Organisation:	Centrica
Date of Representation:	9 August 2018
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

We have reviewed the risks and benefits associated with implementing the Retrospective Data Update approach as per Mod 0434 (as currently specified in the UNC), and on balance we support the approach as outlined in Mod 0651.

We note that 0651 provides a pragmatic near-term approach to allowing for the correction of historical data misalignment, which will improve read, AQ and Reconciliation performance. The original design of 0434 is more complex and given the time that has passed since it was developed and approved, does not reflect the significant progress that has been made with the roll-out of smart meters.

We are mindful of the extent of significant change that will need to be delivered by the CDSP in the next couple of years and the priority of delivering this change is unclear when compared against other changes such as the delivery of faster and more reliable switching, the implementation of Mod 0621 and any outputs from the UIG task force activity.

We remain of the view that a full, enduring solution to Retrospective Data Updates is warranted, and an approach that is fit for the future evolution of the market should remain part of ongoing industry discussions.

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

We agree with the proposer that this modification should not be subject to self-governance arrangements as the changes necessary are likely to have a material impact on customers and seeks to amend a modification proposal that has already received Authority approval.

Implementation: *What lead-time do you wish to see prior to implementation and why?*³³

We would like to see a lead time of at least 6-9 months before the commencement of the bulk cleansing activity, as process and system changes will be required. Timing of delivery will also be important to ensure that implementation does not clash with other CDSP or wider industry changes/initiatives.

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

There will be internal system impacts and costs which have yet to be fully assessed.

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

It is possible that the size of the ‘*portfolio comparison exercise*’, to be conducted by the CDSP, has been underestimated as the legal text only allows 20 Business Days to achieve this and subsequently notify parties of any data misalignment.

In general, the length of time associated with the complete end-to-end data cleanse activity will require further consideration and may subsequently require further changes to the Transitional Rules under paragraph 23.

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.*

None

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

None