

## 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](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Clare Manning
<b>Organisation:</b>	E.ON
<b>Date of Representation:</b>	21/09/2022
<b>Support or oppose implementation?</b>	Comments
<b>Relevant Objective:</b>	<b>d)</b> Positive <b>e)</b> Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

To support the introduction of the scheme we'd support the recommendation for approval, however we'd refer you to the comments on the drafting and the questions which need answering to support Supplier/Shipper delivery.

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

We recognise the implementation times are aggressive and will implement as directed.

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

There will be operational and technical impacts, due to the urgent timings only a rough order of magnitude impact was able to be completed which indicates a high impact due to financial, system and FTE impacts.

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

We support the inclusion of the EPG Scheme Document as an appendix into the UNC (like we have requested in the BSC modification response) to ensure transparency in the requirements and ensure consistent delivery.

We are seeking clarification of the following:

- Clauses 4.3.2 / 1.9.2 / 4.1.8 all advise that committees have no power over the EPG Scheme, although we understand the need to ensure this is clear we are unsure why it is repeated, would it be better to direct all instances to a single clause?
- 1.9.1 / 1.9.5 – we support the establishment of an independent bank account but how is interest on the money paid in being accounted for or will it be established in a way where interest will not be an issue? What is the process to deal with any funds which cannot be passed to Suppliers? And also how will the bank account be closed once the scheme is closed to ensure no funds are remaining?
- 1.9.2 – don't believe the brackets should be numbered 8 / 9 – think this is a formatting issue from the clause above, should it instead be a / b or equivalent
- 1.9.3 – we support this document being a formal appendix
- 1.9.9 – We recognise that the CDSP may want a service line to reflect this activity but there is no charging mechanism to charge this to Suppliers, therefore it would default to Shippers, how are the administration costs expected to be passed to Suppliers in this instance?
- 1.9.10 – Does the CDSP anticipate to utilise MTB costs in the current Budget to fund this activity or will it be recouped at a later date? Can a rough estimate of administration costs be provided?
- 1.9.12 – a clearer approach to scheme closure is provided – how will closing the bank account work? How will it link to any remaining reconciliation? Does the closedown require more thought and instead have a way to freeze new payments whilst the scheme has a controlled closedown?

**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.*

No comments

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

NA