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ICoSS letter regarding appeal of DSC Change Management Committee's decision to reject XRN5554

The Industrial and Commercial Shippers and Suppliers (ICoSS) group is the trade body representing non-domestic industrial and commercial (I&C) suppliers in the GB energy market.

We support the appeal against the decision by the DSC Change Management Committee to reject XRN5554 on 27 September 2022. XRN554 arose out of significant concerns raised by industry parties regarding the AUGE process. In particular many parties wished to ensure there was sufficient oversight so that the industry received a rigorous analysis of the causes of Unidentified Gas and its apportionment is undertaken in line with the principles on which the AUGE regime was developed.

It is clear from previous discussions regarding those concerns that current oversight activities needed to be improved and to that end UNC Modification 0782 was raised to remedy this issue. It was ultimately agreed by the proposer to withdraw the change on the basis that Xoserve had developed and would progress a suitable oversight regime.

It is extremely disappointing that the DSC Change Management Committee has now decided that this solution, which received general support from shippers, is now deemed to be unnecessary. We do not agree with this assertion. The need to ensure a robust and rigorous process for apportioning Unidentified Gas remains. We are not aware of any changes to the current AUGE process that have addressed concerns expressed previously; XRN5554 is the only solution that does.

The UNCC should seek to overturn this decision and approve XRN5554 so that appropriate oversight of the AUGE process is put in place as soon as possible.

Please feel free to contact me if you require anything further.

Yours sincerely



Gareth Evans ICoSS

