

Joint Governance Arrangements Committee (JGAC) 27th May 2021

## ICoSS Response to consultation on the Future status of the Joint Office of Gas Transporters

The Industrial & Commercial Shippers & Suppliers (ICoSS) is the trade body representing the majority of the GB non-domestic energy market. Our members<sup>1</sup>., who are all independent Suppliers, in total supply in excess of three quarters of the gas and half the electricity provided in the highly competitive non-domestic market.

We are writing in response to the proposals to create a new limited company to provide a formal legal entity for the Joint Office.

We understand the rationale behind the creation of a separate legal entity for the Joint Office. It is disappointing that, though the JGAC has been working on these revised arrangements for a year, there has been little consultation with the industry to date on how the Joint Office arrangements should be taken forward.

We believe that there are several important lessons from the Funding, Governance & Ownership (FGO) review of Xoserve that need to be heeded in any future development of the JO arrangements. The ownership arrangements of the JO should be re-assessed so that the potential of the JO can be fully realised, for example providing centralised governance processes for the UNC and IGTUNC or providing centralised legal text services.

In addition we believe that the development of the REC provides opportunities to harmonise code governance across the market and that any evolution of UNC governance should be seen as progressing towards that goal.

We welcome the statement that the JGAC sees this development as a "positive first step". We look forward to engaging with the JO and the Gas Transporters when they bring forward their proposals to further improve the governance and ownership arrangements of the Joint Office.

## **Gareth Evans**





























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