

Representation - Draft Modification Report UNC 0710S

CDSP provision of Class 1 read service

Responses invited by: **5pm on 08 October 2020**

To: enquiries@gasgovernance.co.uk

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

Representative:	Phil Lucas
Organisation:	National Grid NTS
Date of Representation:	8 th October 2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive f) Positive

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

National Grid supports implementation of this Proposal as it enables the delivery of the reading service (for the Supply Meter Points in scope across the Total System) by the single most efficient means possible and for the key beneficiaries of this service to have a greater degree of control in how that service is delivered.

To this extent, National Grid agrees that implementation would further relevant objectives (f) efficiency in the administration of the Code, and (d) the securing of effective competition between shippers.

Self-Governance Statement:

National Grid agrees that this Proposal meets the self-governance criteria for the reasons outlined in the Draft Modification Report and notes the previous Ofgem comment (referred to in the Report) that it was comfortable with this approach.

Implementation:

National Grid requires a minimum implementation lead time of three months in order to make the necessary changes to the contract with our service provider for the single datalogged Class 1 Supply Meter Point on our Network.

Impacts and Costs:

Negligible administration costs may be incurred as a consequence of the transition to a CDSP provided service otherwise we do not anticipate any ongoing costs will be incurred.

Legal Text:

National Grid is satisfied that the legal text delivers the intent of the solution.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

Whilst direct reference is made to the one datalogged Class 1 Supply Meter Point on the NTS, and the fact that the reading arrangements for this falls within scope of the proposed transition to a CDSP provided service, in some parts of the Draft Modification Report the current service is referred to as a 'DNO provided service'. This should be more accurately described as a 'Transporter provided' service currently as is reflected elsewhere in the Draft Modification Report.

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

Not applicable.