





UNC Workgroup Report	At what stage is this document in the process?
<h1>UNC 0710:</h1> <h2>CDSP provision of Class 1 read service</h2>	<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid green; border-radius: 5px; padding: 2px 5px; display: inline-block;">01 Modification</div> <div style="border: 1px solid blue; border-radius: 5px; padding: 2px 5px; display: inline-block;">02 Workgroup Report</div> <div style="border: 1px solid purple; border-radius: 5px; padding: 2px 5px; display: inline-block;">03 Draft Modification Report</div> <div style="border: 1px solid orange; border-radius: 5px; padding: 2px 5px; display: inline-block;">04 Final Modification Report</div> </div>
<p>Purpose of Modification:</p> <p>This Modification proposes that the Central Data Service Provider (CDSP) provides the Class 1 Supply Meter Point read service. It will remove the Transporter obligation to provide a Daily Read service to Shippers for non-telemetered Class 1 Supply Meter Points. This does not affect arrangements for directly connected telemetered Supply Meter Points on Distribution Network Operators (DNOs) or National Transmission System networks.</p>	
	<p>The Workgroup recommends that <u>[this modification should remain Authority Direction, or the governance of this Modification should be reconsidered by the Panel with a view to making it a Self-Governance Modification]</u></p> <p>The Panel will consider this Workgroup Report on 17 September 2020. The Panel will consider the recommendations and determine the appropriate next steps.</p>
	<p>High Impact: None</p>
	<p>Medium Impact: Shippers, NTS, DNOs, IGTs, CDSP</p>
	<p>Low Impact: Suppliers, Consumers</p>

Commented [AR1]: Confirm following discussion

Commented [AR2R1]: I think the view from the group is that this could convert to self-governance but requires a materiality check-point before the governance route be confirmed

Contents	
1 Summary	3
2 Governance	4
3 Why Change?	4
4 Code Specific Matters	5
5 Solution	5
6 Impacts & Other Considerations	8
7 Relevant Objectives	12
8 Implementation	13
9 Legal Text	13
10 Recommendations	13
Timetable	
The Proposer recommends the following timetable:	
Pre-Modification Discussion	24 October 2019
Modification consideration by Panel	21 November 2019
Initial consideration by Workgroup	28 November 2019
Workgroup Report presented to Panel	17 September 2020
Draft Modification Report issued for consultation	17 September 2020
Consultation Close-out for representations	15 October 2020 (20 Business Days) or 08 October (15 Business Days)
Final Modification Report available for Panel	20 October 2020 / 13 October (at short notice)
Modification Panel decision (at Short Notice)	19 November 2020 / 15 October 2020

 Any questions?

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1 Summary

Following work on the withdrawn Modification 0647 *Opening Class 1 reads to Competition* and by the Workgroup for Request 0694R - *CDSP provision of Class 1 Read service*, this Modification proposes that the Class 1 daily meter read service will be provided centrally by the CDSP. Modification 0647 proposed making this a Shipper obligation in line with other meter read obligations, but this is not commercially viable. Equally, provision by individual Transporters is also potentially not viable in the long term due to declining numbers of eligible sites. Although the number of eligible sites are likely to increase due to implementation of Modification 0665 - *Changes to Ratchet Regime*, this will not offset the long-term decline which for WWU has been from 215 eligible sites in 2005 to 45 (plus 2 IGT) in 2019. The Proposal is to not materially change the services, but rather who provides the services. For the avoidance of doubt, this Proposal does not affect arrangements for DNO and NTS connected sites that are telemetered; however, it does affect IGT Class 1 Supply Meter Points and the only NTS Class 1 Supply Meter Point that is not telemetered.

What

The primary reason that a Supply Meter Point is required to be Class 1 is if it has an AQ of over 58.6 GWh; however, there are other reasons including that related to the recent changes to the ratchet charging regime for Class 2 which was introduced by Modification 0665 *Changes to Ratchet Regime*. Class 1 reads are currently a monopoly Transporter obligation and this Modification seeks to remove this restriction, (except for NTS directly connected sites and those DNO sites with telemetry), and transfer the obligation to the CDSP, with the CDSP charging Shippers for services provided. This change will also impact IGTs as, under the terms of Independent Gas Transporters Arrangements Document Section E, DNOs provide a daily read service for IGT Daily Metered (DM) Connected System Exit Points (CSEPs).

Why

This change will give Shippers more control over the service as well as providing a centrally procured service for a low volume but vital activity. Maintaining the existing arrangements is not a viable long-term option because the number of Class 1 sites has been declining since 2005, (notwithstanding that there is likely to be an increase due to Modification 0665), and retaining the service as a Transporter obligation runs the risk of it becoming uneconomic in the future. Transferring the obligation to Shippers is not viable as Shippers would need to have some in house functions and this may discourage competition between Shippers in this market segment. Central provision is a reasonable compromise as it will secure the service and give Shippers, collectively, control over the service. Shippers will gain some control over the service immediately and on re-procurement, Shippers can define all aspects of the service. This could include changing the read delivery deadline, requiring changes to read intervals for reads in addition to the UNC mandated end of Gas Day read, liabilities and KPIs.

How

The Modification will achieve its objective by making the CDSP responsible for providing the Class 1 daily read service and charging Shippers for the services provided. Other than the change to CDSP provision the services will be unchanged except that the definition of the delivery time and date for reads will be defined in the DSC rather than the UNC. Liabilities are currently paid by DNOs for failures of the equipment or their Daily Metered Service Provider (DMSP) but not for any failures once the data has

arrived at the CDSP. This is consistent with other processes carried out by the CDSP. These liabilities are only capped by the general limit on liabilities of £5M for compensation Group A¹. The current liability regime on Transporters will cease, the CDSP will not pay liabilities but will pass on any liability payments they receive in accordance with the terms of the contract with their service providers.

As a result, the charges for Daily Metered (DM) assets and DM read charges will be removed from Transporter Metering Charging statements and will no longer be included in the invoices sent by the CDSP on behalf of Transporters. They will be replaced by DSC charges.

The Proposer envisages that the change over from the current Transporter provision to CDSP provision will occur on a day to be agreed outside the winter period. As the proposal is for the existing contracts to be novated and there is no change in the service provision, we do not envisage this having a noticeable impact on Shippers that use the service.

2 Governance

Justification for Authority Direction

It is worth noting that the workgroup was asked to consider whether this modification should be self-governance, (this was in response to a question from Ofgem although this is not recorded in the minutes of the UNC modification panel 21 November 2019). In addition, the COVID-19 emergency means that there is an argument for not burdening the Authority with additional work at this time together with the possible delay this may entail and therefore the view of the proposer is that on balance this modification should be subject to self-governance.

3 Why Change?

Continued provision of the Class 1 Daily Meter Read service by DNOs runs the risk of the service becoming uneconomic and inefficient and the feedback from previous discussions is that provision of the service by individual Shippers is not attractive and may restrict competition in this market segment. Although moving to CDSP provision does not provide each Shipper individual control, it allows Shippers to collectively define the service. The Proposal is to transfer the service provision to the CDSP by novating the Transporters' contracts with the existing DMSPs from the Transporters to the CDSP. Xoserve will then lead a procurement event at an appropriate time, taking into account when the novated contracts terminate, which will allow Shippers to input into the scope of the service for the next contractual period.

¹ DM metering liabilities fall under TPD V10.1.1, which is set at £5M for compensation Group A in TPD M7.2.5.

4 Code Specific Matters

Reference Documents

[UNC TPD Section M - Supply Point Metering](#)

[UNC IGTAD Section E - DM CSEP Supply Points](#)

[Example of a Transporter's Metering Charges Statement \(WWU\)](#)

5 Solution

The solution is to transfer the existing Class 1 daily read obligations for non-telemetered Supply Meter Points from DNOs to a service provided by the CDSP.

UNC Text

References to the Transporter being responsible for provision of Class 1 reads for non-telemetered Supply Meter Points will be amended to make the CDSP responsible

DNO and NTS Supply Meter Points, where telemetry equipment is fitted, are excluded from the provision of this Proposal, so the UNC text needs to ensure that provisions remain for telemetered Class 1 Supply Meter Points where the Transporter owns the telemetry equipment. This will require definitions of "Datalogged" and "Telemetered" and more explicit statement of the obligations in regard to Telemetered Supply Meter Points.

The current processes and timescales will continue as currently. The CDSP will provide the read to the Shipper within the required timescale. The date and time by which the reads have to be delivered to Shippers by the CDSP will be defined in the new DSC service line and the prescriptive time on D+1 will be removed from the UNC text. This will enable any future changes to be made by a DSC change rather than a Modification, subject to materiality. In the UNC this will be replaced by a requirement that the read for Day 'D' is provided on or before the Exit Close-out Date which is D+5; however, the date and time in the new DSC service line, which is part of the solution in this Modification, will be the same as that currently in the UNC TPD M 7.2.1. Note that there is an inconsistency in the current text between TPD M 5.6.1 that states 11:00 and TPD M 7.2.1 that stated 12:00. When Mod 466A was implemented this amended TPD M 7 but failed to amend 5.6.1 leading to the inconsistency. Since the implementation of 0466A the process has worked to 12:00, so this is the time that is being put into the DSC service line.

TPD Section M 6.2.5 and 6.3.4 will be amended to remove the references to Transporter's metering charging statements in relation to the DM asset and DM read charges. Consequently, DNOs will cease to charge Shippers. New DSC service lines will be created by this Modification (see below).²

² The DM read charge is capped by Transporter licence condition 4D and repeated in Transporter's metering charging statements. The DM asset charge is not capped.

The existing obligation for Transporters to:

- 1) pay liabilities for failure to provide the reads (TPD M 7)

will cease and will be replaced by an obligation on the CDSP to pass on any liability payments for service failures that it may recover from its service providers under the terms of its contracts with them.

The following existing UNC obligations for Transporters will cease and pass to the CDSP :

- 1) Submit reads to Shippers by a given time on D+1 (TPD M 5.6)
- 2) Perform annual check reads and resynchronisation (TPD M 5.12)
- 3) Make consumption adjustments (TPD M 1.9.2)
- 4) The following will be removed from the UNC and put into the DSC, the logic is that it is not an obligation and is an optional service provided by the CDSP to Shippers. Provide within-Day reads obtained from Class 1 Supply Meter Points to Shippers on request (TPD M 6.5)

In addition, the CDSP will also acquire a new DSC obligation to:

- 5) Provide within-Day reads obtained from Class 1 Supply Meter Points to Transporters on request (equivalent of (4) above)

TPD M 7.1.4 relating to Special Supply Metering Points may need to be amended, (and not deleted), and will not be replaced.

For the avoidance of doubt, this Modification will not affect the existing criteria by which a Supply Meter Point is, or may be, required to be Class 1.

TPD Section M Paragraph 8 (IGTS CLASS 1 SUPPLY METERS) and IGTAD Section E Paragraph 2 (CLASS 1 IGTS SUPPLY METER POINTS) will be deleted to remove the obligation on DNOs to provide and satisfy the Class 1 Meter Reading requirement for IGT Supply Meter Points. In consequence, IGTs or Shippers may wish to amend the IGT UNC to align it with the proposed UNC provisions in this Proposal.

DSC service lines

Obligations 1, 2, and 3 above are currently provided under Service Line 1 which is 100% funded by Shippers so no changes to DSC services are required for these.

Obligation 4 is currently provided by Transporters who may charge for this service as listed in their metering charging statements. Transporters will remove this charge from their metering charging statements and it will be replaced by a charge for a new specific service to Shippers under the DSC which will be defined in the Legal Text.

Obligation 5 is a new obligation and will require a new specific service to Transporters under the DSC.

There will be a new Direct Service under Part A Service Area 3 (100% funded by Shippers) that will deliver the Class 1 Read Service and two new Specific Services under Part E Service Area 23 to provide the within day reads service to Shippers and DNOs, that the Shipper and DNO can opt to take if they wish.

These new service lines are part of the Modification and therefore will be implemented in the Data Services Contract when the Modification is implemented. They do not need a separate DSC Change Proposal although we suggest that the DSC Contract Management Committee are notified for information at the appropriate time.

Part A Direct Service - Code Services													
Reference	Service Requirement Description	Service Requirement Trigger	Service Requirement Output	Time for delivery of service requirement	How service requirement delivered	Corresponding UNC requirement	Other corresponding requirement	Service volume constraints (none unless stated)	Performance standard	KPI category (1-4)	Corresponding obligation needed for delivery (Customer Responsibilities)		
Service Area 3: Record/submit Data in Compliance with UNC													
DS-CS SA3-18	Procuring the provision, installation and maintenance of Datalogged Daily Read Equipment and obtaining Daily Meter Readings in respect of Class 1 Supply Meter Points that have dataloggers installed	Ongoing	Management of contracts with Daily Metered Service Providers and subsequent re-procurement to specification agreed with Shippers Passing on any liability payments or service credits for service failure from the Daily Metered Service Provider to Shippers The provision of Daily Meter Readings Class 1 Supply Meter Points that have dataloggers installed Ensuring that the Daily Metered Service Provider under takes site visits and other activities required to ensure the provision of Daily Meter Readings Ensuring CDSP fulfills its obligations in respect of Class 1 Meter Reading in TPD M	Provision of reads by 12:00 hours on D+1	UK Link	TPD Section M 1.14.2; 5.6.1; 6.6.1.; specifically and TPD 5 and 6 more generally				n/a			
Part E Specific Services - Service Area 22													
Reference	Service Requirement Description	Service Requirement Trigger	Service Requirement Output	Time for delivery of service requirement	How service requirement delivered	Corresponding UNC requirement	Other corresponding requirement	Service volume constraints (none unless stated)	Performance standard	KPI category (1-4)	Corresponding obligation needed for delivery (Customer Responsibilities)	Charging Measure	Charging period
SS SA22 87	Provision of within day reads for datalogged Class 1 Supply Points	Shipper opts in to service for all DNs for all Class 1 datalogged Supply Points in its portfolio	UK Link file	Daily	UK Link	Not applicable				n/a		Fixed charge per month	Monthly
SS SA22 88	Provision of within day reads for datalogged Class 1 Supply Points	DNO opts in to service for all Class 1 datalogged Supply Points in its portfolio	UK Link file	Daily	UK Link	Not applicable				n/a		Fixed charge per month	Monthly

Other consequential changes required but not part of Legal Text for this Modification

These comments are included for information and completeness.

Transporters will remove references to the DM read charge and DM asset charge and the charge for provision of within-Day reads from their metering charging statements.

Transition

Cadent, Northern Gas Networks and Wales & West Utilities currently use the same DMSP and SGN use a different DMSP. The Proposal is that initially these contracts will novate to the CDSP on the day the CDSP takes over provision of the service. The CDSP will subsequently procure a replacement service provider, in consultation with Shippers.

Cutover

Following the cutover to CDSP provision there could be circumstances when the previous DMSP needs to submit reads. Examples include late reads which can be submitted up to D+5 and consumption adjustments. Although the contractual arrangements will have changed, the service providers will not, so there should not be any system impacts.

6 Impacts & Other Considerations

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

This Modification Proposal should not impact any current Significant Code Reviews or significant industry change projects.

Consumer Impacts

The change will give Shippers more control of the Class 1 daily read service. The current systems reflect the DNO's and NTS drive to achieve an excellent service to remove the risk of onerous uncapped liabilities being incurred in the tight timescales. Removing the liabilities may result in a cheaper service as Shippers internalise the benefits and costs of achieving a given standard. The resulting service should better reflect customer requirements.

Consumer Impact Assessment

Criteria

Extent of Impact

Which Consumer groups are affected?	The Modification involves Class 1 Supply Meter Points, hence the consumer groups affected would be: <ul style="list-style-type: none"> • Large non-domestic Consumers, and • Very Large Consumers
What costs or benefits will pass through to them?	As this Modification simply transfers responsibility for the service from DNO's to CDSP without changing the contracted DMSPs, consumers should not notice any change to of standard of service, although there may be a revision/ rationalisation of the associated charges
When will these costs/benefits impact upon consumers?	The benefits would be realised upon implementation.
Are there any other Consumer Impacts?	Consumers should receive a seamless transfer as the service transitions to the new service provider – no customer impacts anticipated

Commented [AR3]: No difference in service but would see a difference in the way service is charged

Commented [AR4R3]: Done

General Market Assumptions

Number of [Class 1 Supply Meter Points](#) **456 (as of July 2020)**

Cross Code Impacts

[There would be an impact on the IGT UNC. Currently, an IGT does not have a requirement to provide DM reads in the same way a transporter under the UNC does. For sites that meet the Class 1 \(DM\) read requirement, reads are supplied by the upstream transporter, through arrangements set out in IGTAD. With the removal of the UNC obligation for transporters to obtain DM reads, and the anticipated corresponding unwinding of the IGTAD arrangement, a modification to the IGT UNC would be required to rationalise the drafting of IGT UNC Part E, \(Meter Reading\), to ensure that any IGT Class 1 sites are captured as part of the service novation to the CDSP.](#)

Commented [AR5]: This will need to change and will be revised for the next version of the report IGT UNC change required to deal with procedural matters and cross-referencing issue, but no mod required to define service amendments

Deleted: There will be an impact on the IGT UNC as the DNOs will no longer provide a service to IGTs. Therefore, it is sensible that this Workgroup is operated as a cross code Workgroup with the IGT UNC. IGTs will either need to provide a service or an IGT UNC Modification will be required to replicate the changes in this Modification Proposal.¶

EU Code Impacts

There are no anticipated EU Code Impacts.

Central Systems Impacts

The solution may require some changes to central systems, although as the process will not change these should be minimal. The main change to CDSP will be that it has a new commercial relationship to manage. Operationally the change should make day to day operations easier as the CDSP will have a direct relationship with a service provider, currently the service is procured by DNOs who have one service provider (DMSP) providing data to another (CDSP).

Workgroup Impact Assessment

Questions and Issues Raised by Panel

1. Consider whether this modification satisfies the self-governance criteria specifically bearing in mind the effect on competition.

This aspect of the Modification has been discussed at a number of the Workgroup, since being initially sent to Workgroup by the Panel in November 2019 with the latest position documented below:

The workgroup was asked to consider whether this modification should be self-governance (this was in response to a question from Ofgem although this is not recorded in the minutes of the UNC modification panel 21 November 2019). The workgroup discussed whether this Modification should remain subject Authority Decision.

This modification transfers the obligation from Transporters to the CDSP and therefore the price cap on the DM read charge in Condition 4D of the Transporter licence will no longer apply to this service. This is a significant change; however, given that the contracts between the DNOs and Daily Metered Service Providers are being novated in the short term there should be no effect on the charges Shippers receive and in the longer-term Shippers can define the service that would enable them to influence the charge.

The Workgroup discussed that although the Supply Points that have Class 1 metering are the largest customers the actual number is in the hundreds and the issue that this service is not competitive has never been raised as an issue; therefore, there seems little concern about competition in the provision of this service. This modification will give Shippers more influence over the provision of service and therefore this modification, while not opening the provision to competition, does move it from a service defined by Transporters to one defined by Shippers collectively. The workgroup noted that the previous modification 0647: "Opening Class 1 reads to Competition", would have transferred responsibility for procuring DM reads to the Registered User, but this was withdrawn following feedback from workgroup members.

On balance the workgroup considered that provided there was no significant change to charges, (while acknowledging the would most likely be some), the view was there was scope for the Modification to convert to self-governance.

2. Consider when the proposal should take effect

This question has been the subject of considerable discussion with an initial view that it should be implemented during summer 2020, although recently the view has been revised with an implementation date during summer 2021.

A key step in making the contractual switch from each DNO to the CDSP as service provider would be the establishing of a contractual relationship between the CDSP and the DM Read Service Providers

To achieve this, the current contracts between each DNO and a DMSP would require novation from each DNO to the CDSP. In total, there are [5] contracts in places with 2 DMSPs. The time required for those contracts to be accepted by the CDSP has not, as yet, been documented during Workgroup discussions.

Additionally, while the level of service received by shippers would remain the same as that currently specified in the UNC, there are other aspects regarding the switch of service provider that would be required to be in place prior to implementation, specifically in relation to modifying the CDSP Charging Statement to include the new service item and charges, setting up the associated invoicing and establishing contract management protocols and procedures with the DMSP.

Commented [AR6]: Need to be able to endorse / minimal consequences
CDSP needs to reconcile DN charges to DMSP costs. While acknowledging charges would be different, provided they are of a similar scale, the proposal could probably be SG

Commented [AR7R6]: Done (last para)

Commented [AR8]: Comments: Slight re-phrase inserted

Commented [AR9R8]: Done

Commented [AR10]: Obtain Workgroup Consensus / capture views here

However, in order to progress this modification to consultation, the CDSP has advised that it expects these activities to be resolved between now and the proposed implementation date and facilitate the new arrangements being given effect early Q3 2021

In terms of the implementation timescale, workgroup members provided the following views:.....

Shippers have previously stated in workgroup discussions that they would wish this modification to be implemented outside the winter period; therefore, it seems sensible to implement outside the ratchet period that is in the period June to September inclusive. To allow for any problems to be addressed before the start of the ratchet period in October 2021, an implementation date of 01 June 2021 seems to be a reasonable implementation effective date. It was noted, for charging purposes that the first of the month would be optimal for the transfer to take effect, although it was further noted that with the Daily Metering Charges being invoiced on a daily basis, the first of the month would be preferable, not imperative.

As well as the Panel Questions, as part of the development process a number of other points of note relating to the new arrangements have been discussed:

3. Consideration of other aspects of service transfer to the CDSP and the associated governance arrangements

While in principle the Modification simply facilitates the replacement of one service provider and leaves the service unaffected, the switch in service provider from DNO to CDSP has resulted in some revision to regulatory arrangements and some of the supporting terms and conditions.

Workgroup also noted that:

- the Service performance measure would be established in the DCS as 12.00 (midday) on D+1, (while superficially this may look like a revision to a service level, the time specified simply resolves an existing UNC drafting inconsistency),
- the service failure liabilities set out in the UNC would be disapplied, (although DSC service credits would apply),
- the DM read charge cap, set out in the Transporters' Licence would no longer apply, and
- all aspects of future change to service provision, performance and charging would be managed through DSC Contract and Change Management governance³.

Workgroup members made the following comments in relation to these service and contracting amendments and to the revised governance arrangements:

A view from the DSG governance core-customer groups was relayed to the Workgroup by the CDSP that transferring the service and shift in contractual responsibilities should be seen as a positive event for CDSP customers

.....

[4. Any other area of feedback]

³ [Data Services Contract Change Management Procedures](#)

Commented [AR11]: COMPLETE DATE

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Deleted: coming into

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Deleted: In terms of the implementation timescale, workgroup members provided the following views¶

Commented [AR15]: CDSP commented that the view of the DSG governance groups was that the switch of service provision should transfer – as stated by DSG core customers groups

Commented [AR16R15]: Done

Commented [AR17]: ADD ADDITIONAL COMMENTS HERE

Rough Order of Magnitude (ROM) Assessment

CDSP advised that a ROM would not be required as no systems would need to be modified to effect the switch in service provider although it noted that there may be some costs associated with transition and set-up.

7 Relevant Objectives

Impact of the modification on the Relevant Objectives:	
Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	None
b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.	None
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	Positive
e) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers.	None
f) Promotion of efficiency in the implementation and administration of the Code.	Positive
g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

Moving to CDSP provision of the Class 1 meter read service would allow Shippers to define the service. This will allow them to define the service that best meets their needs rather than having a service determined by Transporters, this would further Relevant Objective (d).

The proposed Modification should make day to day operations easier as the CDSP would have a direct relationship with a the DMSP, rather than the service being procured directly by DNOs to provide data to the CDSP and therefore further Relevant Objective f).

8 Implementation

A lead time will be required to implement any necessary central system changes, although at present these are expected to be minimal although for extra peace of mind it is proposed that the change comes into effect outside a winter period.

As described in Section 6, given the necessary arrangements which require resolution and be established by the CDSP, and with due consideration of the prioritisation of activities brought about by the COVID-19 pandemic, the view of the Workstream is that the effective target implementation window should be [early Q3 2021](#).

Additionally, it is the view of the Workgroup that this length of implementation lead-time should provide sufficient time for the novation of the contracting arrangements and all other aspects of industry and corporate governance to be resolved, although noting that implementation would be delayed, if this is not the case.

Commented [AR18]: CONFIRM VIEWS Reword around June

9 Legal Text

[Legal Text Commentary](#)

Commented [AR19]: Link to Document

[Legal Text](#)

Commented [AR20]: Link to Document

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to

- consider the views of the proposer and the Workgroup, set out in Section 6: (Workgroup Impact Assessment), and consider whether or not this proposal should now proceed as a Self-Governance Modification,
- agree that this Modification should proceed to consultation, and
- agree the preferred option for the consultation timeline.