

Consultation Response

IGT124: Market Participant MDD Migration to UNC Governance from the SPAA

Responses invited by: 15 07 2019

Respondent Details

Name: Megan Coventry

Organisation: on behalf of Southern Electric Gas Ltd and SSE Energy Service Ltd

Support Implementation	☒
Qualified Support	☐
Neutral	☐
Do Not Support	☐

Please briefly summarise the key reason(s) for your support / opposition

We support this change to make the necessary updates to the IGT UNC and ancillary documents in relation to the changes being made via SPAA SCP467, UNC 0682 and DSC XRN 4851, which combined will move the management of MDD for gas from the SPAA to the UNC and DSC governance, as per the intention of the Ofgem Switching Programme and introduction of the REC.

Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

We agree that this follows Authority consent procedures in order to align with the related UNC/ SPAA/ DSC change progression together.

Please state any new or additional issues that you believe should be considered

None.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree that this modification positively impacts relevant objective F) to promote efficiency by making the IGT UNC ready for the implementation of the Faster Switching Programme and REC.

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

Some systems and process change may be required dependent on whether much change is required to MDD processes as performed today.

Implementation

What lead time would you wish to see prior to this modification being implemented, and why?

We support implementation in February 2020 in alignment with the related SPAA, UNC and DSC XRN changes.

Legal Text

Are you satisfied that the legal text will deliver the intent of the modification?

Yes

Further Comments

Is there anything further you wish to be taken into account?

No.

Responses should be submitted by email to IGTUNC@gemserv.com