

Consultation Response

IGT162: Appointment of CDSP as the Scheme Administrator for the Energy Price Guarantee (EPG) for Domestic Gas Consumers (Gas)

Responses invited by: 16 November 2022

Respondent Details

Name: Kundai Matiringe

Organisation: BUUK Infrastructure

Support Implementation x

Qualified Support

Neutral

Do Not Support

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

We support the implementation of this change proposal because it will ensure that the IGT UNC is aligned to the current CDSP delivery and thereby ensure the accuracy of the obligations under code.

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?

BUUK agrees with the proposer and panel's determination that IGT162 should be treated as an Authority Decision Modification as it did not meet the Self-Governance Criteria due to the material impact it would have on Consumers.

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

N/A

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree with the workgroup that Relevant Objectives D and E are better achieved by this change. We also believe there is a positive impact on Objective (F) as IGT162 would ensure that the IGT UNC aligned with necessary provisions within the UNC that were delivered under UNC0824.

Impacts and Costs

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

There are no impacts or costs foreseen by this change specific to IGT UNC processes as a new Shipper funded Service Line will be required within the Data Services Contract Service Description Table for a Direct Service Code Service provided to Shippers to require that the CDSP performs this function.

Implementation

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

As the EPG Scheme is already running without the necessary provisions to administer the Scheme in the IGT UNC the Modification should be implemented as soon as possible after approval.

Legal Text

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

The Legal Drafting delivers the intent of the IGT162 solution.

Further Comments

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

N/A

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