

Consultation Response

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

Responses invited by: 16/11/2022

Respondent Details

Name: Michelle Brown

Organisation: Energy Assets Pipelines

Support Implementation X

Qualified Support

Neutral

Do Not Support

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

EAP support the modification as the appointment of the CDSP as the Scheme Administrator is required to enable the implementation of the EPG (Gas) as soon as possible and to ensure it delivers in line with the Government Direction as soon as possible. The CDSP has been instructed by BEIS to administer the Scheme and it is believed that this service can be provided efficiently and economically, by leveraging the data that the CDSP has access to and potentially utilising synergies with existing processes operated by the CDSP.

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?

EAP agree that this modification should not be a self-governance modification as it would result in a material change to the code, including changes to the Modification Rules and therefore should be sent for Authority Direction.

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 consider that this change would have a positive effect on relevant objectives (D) and (E).

Due to the EPG (Gas) expected to enable Suppliers to recover their necessary costs as afforded by the Energy Price Cap, whilst protecting consumers from a substantial proportion of the increase that they otherwise would have faced.

The consumer protection should reduce instances of bad debt to Suppliers thereby reducing the risk of Supplier (and Shipper) failure and ensuring the continued provision of gas to all domestic consumers

Impacts and Costs

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

This would have no ongoing costs as noted on the modification the approach that is requested for approval has already been running.

Implementation

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

Immediate implementation on approval as this is already running without the provisions to administer the scheme in IGT UNC.

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