

Rachel Clark
Programme Director
Ofgem
10 South Colonnade
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E14 4PU

15th January 2021

Dear Rachel,

Re: Switching Programme and Retail Code Consolidation: Proposed Licence Modifications

Thank you for the opportunity to comment on the consultation document. Having reviewed the documentation provided, we have a couple of responses/observations that we consider are worth highlighting.

Firstly, with respect to Transporter Licence Condition 31 (Question 3.2) Xoserve agrees with the modifications as drafted. The proposed derogation to allow Ofgem to remove SLC31 requirements is also agreed in principle subject to a mandatory Consultation and that there is due regard given to the consequences of removing this, namely impact on the DSC services provided by CDSP resulting in stranded services with no allocation of budget by any party to pay for them. Xoserve does acknowledge the likely mitigation of these types of consequences will be dealt with in the scoping of the Gas Enquiry Service under the Retail Energy Code.

We would also note that with respect to the Supply Licence change detailed in Question 1.3, there is no direct impact on the CDSP/GRDA of this proposal as our design would accommodate these timescales. The ability for the consumer to elect longer timescales will mean that the design does not change for the maximum lead time for a registration, we would also highlight that the ability to monitor this metric is assumed will be sourced directly from the Supplier and not a central service provider.

We would also highlight that with respect to the proposed changes to the Shipper Licence, some Supply Meter Points are expected to be excluded from the scope of CSS. We presume that Ofgem are satisfied that for the small number of Supply Meter Points that are out of scope that this does not warrant inclusion within the Licence.

Yours Sincerely

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