

■ DP301 'Review of Additional Registration Data (Gas Transporters)'

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Progress to Refinement Process

MEDIUM

Overview

- Gas Network Parties are party to the SEC whilst having only two explicit obligations within the Code.
- These obligations relate to the provision of Additional Registration Data, as found in SEC Section E.

Issue



- Gas Network Parties are subject to the full regulatory requirements that come with accession to a Code, which results in costs to their organisation.

Impact



- Drafting changes to Section E – ‘Registration Data’ to remove the obligation to provide Additional Registration Data
- Cross-Code Modification with the REC to transfer the obligation to that Code.

Potential Solution

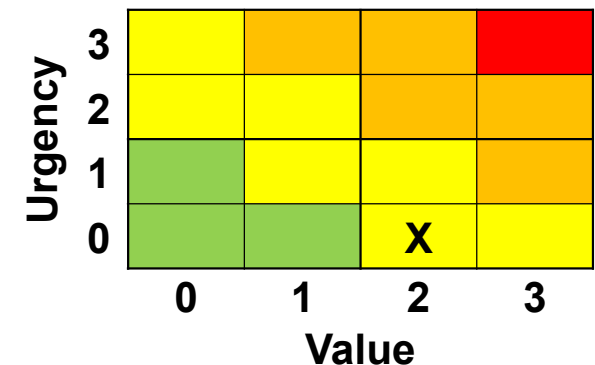


■ Prioritisation

Legal & regulatory compliance	Operational performance	Cost benefit	Consumer impact	Security impacts	Value	Urgency	Priority
2	0	2	0	1	2	2	Medium

Rationale

- Moderate impact on legal & regulatory compliance based on the Proposed Solution resulting in Gas Network Parties leaving the SEC – A significant change to the makeup of the Code.
- Moderate impact on cost-benefit based on savings which may be incurred by Gas Network Parties should they divest themselves from the FTE and operational costs associated with membership of an industry Code.
- All other metrics given a score of zero or one, as appropriate.



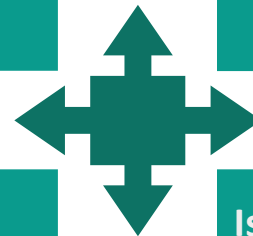
■ DP301: Assessment of the Issue

Has the issue or business problem been clearly defined?

- Partially; SECAS will explore the secondary ramifications of Gas Network Parties leaving the SEC beyond the changes to the provision of Additional Registration Data.

Has the nature and scale of the impact if the issue is not resolved been clearly described?

- The broader impact of the removal of this obligation to the REC will be explored during solution development.



Is a change to the SEC required to resolve this issue?

- Changes to SEC Section E – ‘Registration Data’ to remove obligations on Gas Network Parties to provide Additional Registration Data.

Is there an indicative view of a proposed solution and the likely scale of the impacts and costs arising from this?

- To be determined during the refinement of this Modification.

■ Areas for Assessment

Areas of Assessment

SECAS will need to assess the following as part of the Refinement of this Modification:

- **Determination of scale of Gas Network Party obligations:**
 - SECAS to determine what non-explicit obligations exist for Gas Network Parties, for example: DCC User Status, ability to communicate with SMSs, requirement to accede to the SEC in the Ofgem GT Licence.
- **Assessment of the REC as an alternative to the SEC:**
 - DP301 to be progressed as a Cross-Code Modification with REC Issue I0262.
 - SECAS to work with the REC Code Manager to understand if the REC can provide the same level of assurances surrounding the provision and usage of data as is currently found in the SEC.

■ Timetable

Date	Event/Activity	Notes
September 2025	Change Sub-Committee	
October 2025	Review of Legal Drafting	
October 2025	Sub-Committees	
November 2025	Working Group	

Issues Group

Supportive of progression as Modification

Highlighted broader impacts on the SEC as a Code should Gas Network Parties leave

Highlighted potential for impact on the
DUIS

■ DP301: Recommendations

- **DETERMINE** whether the issue and the impact it is having is clearly defined and understood
- **DETERMINE** whether DP301 should be converted to a Modification Proposal
- **DETERMINE** whether MP301 should be progressed to the Refinement Process
- **AGREE** the first package of work and the timetable for MP301