

Representation - Draft Modification Report UNC 0683S

Offtake Arrangements Document (OAD) Review Updates – Phase 1

Responses invited by: **5pm on 07 May 2020**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Leteria Beccano
Organisation:	Wales & West Utilities
Date of Representation:	
Support or oppose implementation?	Support * <i>delete as appropriate</i>
Relevant Objective:	<p>a) Positive</p> <p>b) Positive</p> <p>f) Positive</p>

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

WWU supports this modification as we agree that certain sections of OAD have been unclear and ambiguous at times which have resulted in differing interpretations by the GDNs. The proposed modifications will make the sections clearer and add sections that were not included in the original OAD. The proposed Supplemental Agreement will be more comprehensive and will enable the GDNs to capture more equipment detail and at the same time aid clarity over ownership of the equipment.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

We agree that this modification satisfies the self-governance criteria.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

As this is a Self-governance modification we would support implementation 16 business days after a modification panel to implement as there is no reason for any delays and it would signal a completion of Phase 1 which will enable the 0646R review group to move onto the next Phase.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

If the modification is approved, the GDNs will be tasked with updating their own portfolio of Supplemental Agreements with the agreement of NTS.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

No

Please provide below any additional analysis or information to support your representation

None