

Representation Draft Modification Report

Modification UNC 0731S Introduction of an Annual Modification Panel Report

1. **Consultation close out date:** 10th December 2020
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:**
Gazprom Energy
5th Floor
8 First Street
Manchester
M15 4RP
4. **Representative:**
Steve Mulinganie
Regulation Manager
stevemulinganie@gazprom-mt.com
0799 097 2568 / 0751 799 8178
5. **Date of Representation:** 10th December 2020
6. **Do you support or oppose Implementation:**
We **Support** implementation of the Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
We raised Modification 0731S to recognise the role and importance of the independent Chair and to provide them with an independent vehicle (annual report) to support the continuous improvement and to ensure the efficient and effective operation of the Modification Panel and UNCC.
8. **Are there any new or additional Issues for the Modification Report:**
No
9. **Self-Governance Statement Do you agree with the status?**
Yes
10. **Relevant Objectives:**
How would implementation of this modification impact the relevant objectives?
We continue to **agree** that this modification is positive in respect of **Relevant Objective (f)** as this Modification should create an environment of continuous improvement and adoption of industry best practice by Panel and UNCC which should lead to a furthering in the efficiency in the implementation and administration of the Code.

11. Impacts & Costs:

What analysis, development and on-going costs would you face if this modification was implemented?

We **have not** identified any significant costs associated with this modification

12. Implementation:

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

We would like to see this modification implemented as soon as reasonably practicable and we would expect the first Annual Report to be produced as soon as reasonably practicable following the implementation of the modification

13. Legal Text:

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

We have **no comments** on the Legal Text provided.

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

Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or you wish to emphasise.

No