

## Representation

### Draft Modification Report

#### 0461 - Changing the UNC Gas Day to Align with the Gas Day in EU Network Codes

**Consultation close out date:** 27 January 2014  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** Scotland & Southern Gas Networks  
**Representative:** Erika Melén  
**Date of Representation:** 27 January 2014

#### Do you support or oppose implementation?

Support

#### Please summarise (in one paragraph) the key reason(s) for your support/opposition.

SGN appreciate the reasons for and the process which has been adopted for developing this modification as well as the work carried out by National Grid Transmission and as this is an EU requirement to comply with, we offer support for this modification. However, we have to note that this will be a potentially expensive solution to implement across the industry with no substantial benefits to the UK energy industry identified.

#### Modification Panel Members have indicated that it would be particularly helpful if the following question could be addressed in responses:

Q1: Please provide views on the time constraints of the process and effort required to implement this modification.

Gas Transporters are still evaluating the system and process changes which will be required to implement this modification

#### Are there any new or additional issues that you believe should be recorded in the Modification Report?

No

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

SGN agree with the proposer that this modification better facilitates relevant objective (g) as it will facilitate compliance with European legislative requirements

#### Impacts and Costs:

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*What analysis, development and ongoing costs would you face if this modification were implemented?*

Gas Transporters are currently evaluating the costs to our businesses of implementing this change

**Implementation:**

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

We will work to enable implementation from October 2015

**Legal Text:**

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

Yes

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

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

No