

## Representation

### Draft Modification Report

#### 0476S – Alignment of DN Charging Methodology with RIIO-GD1 Arrangements

**Consultation close out date:** 06 February 2014  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** Scotland and Southern Gas Networks  
**Representative:** Joel Martin  
**Date of Representation:** 06 February 2014

#### Do you support or oppose implementation?

Support

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

UNC Modification 476S raised by National Grid Distribution proposes to modify Section Y of the Uniform Network Code to align the provisions relating to the distribution transportation charging methodology following the introduction of the RIIO GD-1 price control in April 2013. The Modification also removes references to the interruptible supply point regime which was removed following the implementation of UNC Modification 090.

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

None.

#### Self Governance Statement:

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

SGN agree with the Modification Panel's decision regarding the application of the self governance rules in relation to UNC Modification 476S as the implementation of this Modification will have no material impact on Shippers or end user customers.

#### Relevant Objectives:

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

SGN consider the implementation of Modification 476S would impact on the relevant objective; *"Compliance with the charging*

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*methodology results in cost reflective charges” as this would align UNC provisions to those introduced under the RIIO – GD1 price control.*

**Impacts and Costs:**

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

SGN do not envisage any implementation costs directly associated with this Modification Proposal.

**Implementation:**

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

As this Modification is effectively correcting the provisions in the UNC to reflect changes implemented under RIIO-GD1 and the previous implementation of UNC Modification 090 SGN consider that Modification 476S could be implemented straightaway following Ofgem direction.

**Legal Text:**

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

SGN are satisfied that the legal text accurately reflects the solution as drafted in the Modification.

**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.*

None.