

Representation - Draft Modification Report 0566S

UNC modification stakeholder engagement and Guidelines

Responses invited by: **15 January 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Angharad Williams
Organisation:	National Grid NTS
Date of Representation:	13/01/2016
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

We support this Modification Proposal because we believe the changes proposed encourage greater stakeholder engagement prior to the raising of a Modification. This may aid in the initial development of Modifications prior to being submitted to Panel, which in turn may lead to better developed Modifications being submitted, facilitating discussion at workgroups. Therefore ensuring that workgroup participants' time is being used more efficiently.

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

National Grid Transmission agrees that this Modification Proposal is unlikely to have any material impact on industry participants and so should be subject to self-governance procedures.

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

We agree that this Modification Proposal can be implemented with immediate effect 16 business days after an approval decision by the UNC Modification Panel.

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

This Modification Proposal has no incremental impacts or costs as it is only a minor change to governance.

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

Yes, we are happy that the legal text will deliver the proposed changes.

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.*

None identified.

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

We note that Panel can now request further development of a Modification prior to taking a decision on whether the Modification can proceed to the next step. We also recognise the Modification Proposals clarification that this should only apply where the Modification does not sufficiently justify that it is a code matter, the impacts are not fully developed or other relevant circumstances. However, it may be helpful if Panel provided some further clarity around this to address concerns that a Modification may be referred simply because it is contentious.