

## Representation - Draft Modification Report 0566S

### UNC modification stakeholder engagement and Guidelines

Responses invited by: **15 January 2016**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Richard Pomroy
<b>Organisation:</b>	Wales & West Utilities Ltd
<b>Date of Representation:</b>	14 <sup>th</sup> January 2016
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	f) Positive

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

We support this proposal as it introduces a useful guidance document regarding raising modifications; clarifies the critical friend process; and gives the modification a valuable tool, which we expect to be used rarely, to refer modifications back to the proposer if they are unclear. Overall this should improve the quality of modification proposals and increase the efficiency of the end to end modification process.

We believe that this modification will help deliver some of the aims of the Ofgem Code Governance Review 3.

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

We agree that this satisfies the self-governance criteria.

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

This modification should be implemented sixteen business days after a Modification Panel decision to implement, subject to no appeal being raised.

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

None

**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**