

**Representation  
Draft Modification Report**

**Draft Modification Report 0563S  
Moving the NTS Optional Commodity Charge Formula into the UNC**

1. **Consultation close out date:** 15<sup>th</sup> January 2016
2. **Respond to:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)
3. **Organisation:**  
Gazprom Energy  
Bauhaus, 5<sup>th</sup> Floor  
27 Quay Street  
Manchester
4. **Representative:**  
Steve Mulinganie  
Regulation & Compliance Manager  
[stevemulinganie@gazprom-mt.com](mailto:stevemulinganie@gazprom-mt.com)  
07590 245 256
5. **Date of Representation:** 14<sup>th</sup> January 2016
6. **Do you support or oppose Implementation:**  
We **Support** implementation of Modification **0563S**
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**  
We believe it is important to bring the NTS Optional Commodity Charge Formula into the UNC so that it cannot be changed unilaterally by National Grid without appropriate consultation with the industry or oversight by the Regulator
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 agree with the proposer of the modification that this proposal is Positive in respect of Relevant Objective (b) & (e)
11. **Impacts & Costs:**  
*What analysis, development and on-going costs would you face if this modification was implemented?*  
We have not identified any costs associated with this modification

**12. Implementation:**

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

As soon as practicable after the UNC panel vote

**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.