

Representation - Draft Modification Report 0582S

Amendments to reflect separation in legal ownership of NTS and National Grid owned LDZs to facilitate the sale of National Grid's Gas Distribution Business

Responses invited by: **5pm on 11 August 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Phil Lucas
Organisation:	National Grid NTS
Date of Representation:	10 th August 2016
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

National Grid NTS agrees with the conclusion of the Workgroup that implementation of this Proposal would better facilitate relevant objective f) *Promotion of efficiency in the implementation and administration of the Code*. This is on the basis that implementation would ensure the effective contractual transition to the establishment of an additional Transporter in the UNC to reflect the separation of National Grid Gas Distribution Ltd (NGGDL) from National Grid.

Self-Governance Statement:

National Grid NTS agrees with the conclusion of the Modification Panel that this is a self-governance modification. Taken in isolation this Proposal merely seeks to extend the already established principle of multiple Transporters in the UNC which is not expected to have a material impact on gas consumers or competition.

Implementation:

National Grid NTS does not require a specific lead time for implementation. We note that in principle the changes (if directed for implementation) will take effect from the DN Hive Down Implementation Date which is defined as the date from which National Grid ceases to be a DN Operator.

Impacts and Costs:

No additional analysis, development or ongoing costs would be incurred by National Grid NTS.

Legal Text:

National Grid NTS is satisfied that the legal text delivers the intent of the solution advocated by this Modification Proposal.

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.*

We have not identified any errors or omissions that we believe should be taken into account.

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

N/A