

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:	Charles Ruffell
Organisation:	RWE Supply & Trading GmbH
Date of Representation:	5 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)

The creation of separate legal and licenced entities as part of NGG's proposed sale of its distribution assets requires consequent changes to the UNC and other documents. We believe that the solution set out in this modification proposal will deliver the required changes to ensure the UNC continues to operate after hive-across.

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

We agree that this should be subject to self-governance.

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

The implementation timetable should be aligned with any linked modification proposals to ensure a coordinated and orderly process.

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

None.