

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:	Hilary Chapman
Organisation:	SGN
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)

SGN supports this modification and considers that it delivers the amendments to UNC required to support the creation of separate legal and licenced entities as part of NGG's proposed sale of its distribution assets.

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

SGN supports the self-governance status of this modification.

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

We would support implementation at the earliest possible date following a Modification Panel decision in order to provide the industry with certainty and stability. However we would also suggest that implementation of this modification is aligned with that of any related modifications, in order to provide a smooth and coordinated transition into the new arrangements.

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

None identified.

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.*

N/A

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

N/A