

Representation - Draft Modification Report 0577S

Aligning UNC to the indirect clearing model operated by ICE Endex

Responses invited by: **5pm 11 April 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Jennifer Randall
Organisation:	National Grid NTS
Date of Representation:	11 April 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 supports this modification. On 24 February 2016 ICE Endex took over the role of Trading System Clearer for the OCM. This UNC modification simply codifies the relationships established as a result of the clearing migration and appropriately defines the parties involved. For clarity, as highlighted in the modification there is no interaction with UNC Modification 0568.

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

National Grid NTS supports the self-governance statement contained within the draft modification report. This modification describes only minor structural changes to the arrangements for the Trading System Clearer which are not expected to have a material impact on competition between Shipper Users, nor on the operation of the pipeline system.

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

National Grid NTS requests that this code modification is implemented as soon as possible. As this modification is self-governance implementation could be sixteen business days after the Modification Panel decision to implement (scheduled for the 21 April 2016), subject to no Appeal being raised.

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

National Grid NTS does not expect there to be any ongoing costs as a result of this modification.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes National Grid NTS are satisfied that the legal text will deliver the intent of the solution contained in 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.*

No

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

N/A