

Representation Draft Modification Report

Modification 0484S - Guidance for the production of legal text

1. **Consultation close out date:** 19th May 2014
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:** Gazprom Energy
Bauhaus, 5th Floor
27 Quay Street
Manchester
4. **Representative:** Steve Mulinganie
Regulation Manager
stevemulinganie@gazprom-mt.com
07590 245 256
5. **Date of Representation:** 19th May 2014
6. **Do you support or oppose Implementation:**
We Support Implementation
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
We believe the introduction of guidance will have a positive effect by creating a more transparent and consistent approach as the UNC is currently largely silent on the process for producing text.
8. **Are there any new or additional Issues for the Modification Report:**
We have not identified any new or additional issues
9. **Self-Governance Statement Do you agree with the status?**
We agree with the Self Governance status
10. **Relevant Objectives:**
How would implementation of this modification impact the relevant objectives?
We set out in our modification our belief that the proposal has a positive impact in respect of Relevant Objective (f) as it creates a consistent process for all parties to follow. Responsibilities are clarified and transparency will be introduced to the existing process.

11. Impacts & Costs:

What analysis, development and on-going costs would you face if this modification was implemented?

We have not identified any additional costs and believe the modification may reduce costs for parties raising modifications as it should introduce efficiencies in the existing process.

12. Implementation:

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

We would like to see the modification introduced as soon as reasonably practicable in accordance with the self-governance rules.

13. Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

We are satisfied with 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