

## Representation - Draft Modification Report UNC 0656

### Changes to Modification Panel arrangements

Responses invited by: **5pm on 11 October 2018**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities Ltd
Date of Representation:	11 <sup>th</sup> October 2018
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

We support this proposal because it provides improvements to the Modification Rules in three areas - conflicts of interest, attendance at the planned monthly Panel meetings and Panel elections. With regard to the fourth area of change, we understand the reason for making appointment of two Alternates compulsory but would have preferred an obligation to appoint one with an option to appoint a second.

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

We suggest that this is implemented the day after the monthly Panel meeting following an Authority direction to implement.

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

WWU will only incur additional ongoing costs should the Panel Chair need to instigate an investigation into an alleged conflict of interest. We hope that this will not be required.

**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**