

Representation - Draft Modification Report UNC 0839

Revision of the Modification Panel Membership Cessation Provisions

Responses invited by: **5pm on 07 July 2023**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Phil Lucas
Organisation:	National Gas Transmission
Date of Representation:	29 June 2023
Support or oppose implementation?	Support
Relevant Objective:	f) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

As the proposer, National Gas Transmission ('NGT') supports the implementation of this Modification Proposal.

This Proposal addresses a deficiency in the current arrangements whereby no explicit rules set out the consequence for an existing Member of the UNC Modification Panel who, due to a change in circumstances, is no longer employed or engaged by the same specified entity as at the time of nomination.

All Members of the UNC Modification Panel (aside from the Chairperson) are required to represent a specific entity (or entity type, as part of a constituency) and therefore a change in circumstances of this nature brings into question their ability to be a Representative as required by the Modification Rules.

Given this, we believe that clarification of the arrangements where a Member of the Modification Panel ceases to be employed or engaged by the same specified entity as at the time of nomination (as set out in this Proposal) better facilitates the objective of the promotion of efficiency in the implementation and administration of the Code by adding the clarity which is absent under the current rules.

Implementation:

No lead time is required for implementation from an NGT perspective.

Impacts and Costs:

NGT will not incur any material costs in the event of the implementation of this Proposal.

Legal Text:

NGT is satisfied that the legal text delivers the intent of the solution identified in this Proposal.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

NGT has not identified any such errors or omissions.

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

Not applicable.