

## Representation

### Draft Modification Report

#### 0462: Introducing Fast Track self Governance into the Uniform Network Code

**Consultation close out date:** 10 December 2013  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** EDF Energy  
**Representative:** Natasha Ranatunga  
**Date of Representation:** 05 December 2013

#### Do you support or oppose implementation?

Support

#### Please summarise (in one paragraph) the key reason(s) for your support/opposition.

The introduction will promote good industry practice by aligning the UNC with other industry codes, enabling code changes to occur in a timely and efficient manner with the appropriate management of industry participants' and Authority time and effort around minor housekeeping modifications.

#### Are there any new or additional issues that you believe should be recorded in the Modification Report?

No

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

We agree with the views of the proposer that there is a positive impact on:

- c) Efficient discharge of the licensee's obligations.*
- f) Promotion of efficiency in the implementation and administration of the Code.*

#### Impacts and Costs:

*What analysis, development and ongoing costs would you face if this modification were implemented?*

None

#### Implementation:

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

As the proposer suggests the modification proposal should be incorporated into the UNC as soon as possible once the legal text formatting has been rectified.

0462  
Representation  
1 November 2013

Version 1.0

Page 1 of 2

© 2013 all rights reserved

#### Legal Text:

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

We are satisfied that the legal text will deliver the intent of the modification, however we have noted that there are formatting issues throughout the legal text that has been issued for consultation and it would need to be revised.

Furthermore, there is a minor typographical error to paragraph 6.2.1 m (referenced the live UNC document not proposed UNC text). We suggest the following:

*shall, without prejudice to the Modification Panel's right of determination pursuant to paragraph 7.2, state the Proposer's preference as to whether the Modification Proposal should;*

| ~~\_(vii)(ix)~~ *be subject to the Request Procedures;*

| ~~(viii)(x)~~ *proceed to Workgroup Assessment; or*

| *(xi) proceed to ~~the~~ Consultation; or*

| ~~\_(ix)(xii)~~ *where 6.2.1(c)(ii) applies, be implemented.*

**Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*

No