

Joint Office of Gas Transporters  
[Enquiries@Gasgovernance.co.uk](mailto:Enquiries@Gasgovernance.co.uk)

17 January 2018

Dear Joint Office,

**Re: UNC Modification Proposal 0623 Governance Arrangements for Alternatives to Self-Governance Modification Proposals**

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Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this Modification.

**NGN supports this Modification proposal**

**Reasons for Support/Opposition:**

NGN supports this modification as it will clarify governance arrangements regarding s

**Self-Governance Statement:**

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

Yes, NGN agrees that this modification should be subject to Authority decision due to it having a material impact on modification rules.

**Relevant Objectives:**

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

NGN agrees that this modification would further both Relevant Objectives C) Efficient Discharge of the Licensee's Obligations and F) Promotion of Efficiency in the Implementation and Administration of the Code.

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**Impact and costs:**

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

NGN does not believe any additional costs would be incurred for this modification.

**Implementation:**

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

NGN believes that this modification should be implemented as soon as possible after Authority decision.

**Legal Text:**

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

Yes, NGN agrees that the legal text reflects the solution set out in this modification.

**Errors or Omissions in the Modification Report:**

N/A

**Any additional comments:**

N/A

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,



Shanna Key  
Industry Codes Officer

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the network**