

Representation - Draft Modification Report UNC 0623 Governance Arrangements for Alternatives to Self-Governance Modification Proposals

Responses invited by: **5pm on 17 January 2018**

To: enquiries@gasgovernance.co.uk

Representative:	Debbie Brace
Organisation:	National Grid NTS
Date of Representation:	16 th January 2018
Support or oppose implementation?	Support
Relevant Objective:	c) Positive f) Positive

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

We support this Modification proposal as it will clarify the governance process around Self-Governance modifications with alternates. It also introduces a mechanism which allows for a scenario where an alternate modification is under a different governance route, under the solution it will receive equitable management by treating the Self-Governance modification with the governance path of the higher precedence modification.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

We agree that it is appropriate for this Modification to be sent to the Authority for direction, due to amendments to the Modification Rules.

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

This Modification should be implemented as soon as possible following an Authority decision.

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

No costs identified

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

National Grid NTS is satisfied that the legal text delivers the intent of the Modification proposal.

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

There are no further changes required.

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

Not applicable