

## Representation - Draft Modification Report UNC 0829S

### Updates to the Supplemental Agreement Amendments Process

Responses invited by: **5pm on 06 June 2023**

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

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

<b>Representative:</b>	Leteria Beccano
<b>Organisation:</b>	Wales & West Utilities
<b>Date of Representation:</b>	6 <sup>th</sup> June 2023
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

WWU supports this modification.

Workgroup 0646R agreed that the existing arrangements needed to be updated because the arrangement were now out of date and should be brought up to date in line with current practice. The workgroup has successfully introduced several Modifications that are/will be implemented, namely, 0683S, 0792S and 0829S. If this Modification is approved and implemented, it will deliver one agreed Supplemental Agreement Amendment process which will provide the Gas Transporters and National Gas with a uniformed approach which should make it easier for all involved in the proposed process.

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

We agree that this modification satisfies the self-governance criteria.

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

This modification should be implemented in line with current guidelines following a Modification Panel decision to implement, subject to no Appeal being raised.

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

None.

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

Yes, the legal text will deliver the intent of the Solution, but we have identified an issue with the numbering of OAD Section 1.2.1 following the implementation of MOD 0834. If the numbering is not corrected it will overwrite the Supplemental Agreement Amendment Process which is not what is intended. Please see comments below.

**Modification Panel Members have requested that the following questions are addressed:**

*Q1: Are there consequential issues for inflight projects to move to the new process?*

It would be beneficial to the GDNs who have inflight projects to continue to be managed under the regime under which they commenced. New projects agreed after the implementation date would be subject to the new arrangements.

**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**

Following the implementation of MOD 0834 on 12<sup>th</sup> June 2023. OAD Section 1.2.1 (h) and (i) will become:-

h) the Supplemental Agreement Amendment Process (referred to in paragraphs 3 and 10): and

(i) any other document which may be specified or may be agreed by the Parties to be an Offtake Subsidiary Document.

This will mean that the legal text following Panel approval should be as follows:-

(i) the Supplemental Agreement Amendment Process (referred to in paragraphs 3 and 10): and

(j) any other document which may be specified or may be agreed by the Parties to be an Offtake Subsidiary Document.