

## Representation

### Draft Modification Report

#### 0490S – Updates to UNC TPD Section B to correct anomalies arising from the implementation of UNC Modification 0376S “Increased Choice when Applying for NTS Exit Capacity”

**Consultation close out date:** 04 April 2014

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** British Gas Trading Limited

**Representative:** Graham Jack

**Date of Representation:** 04 April 2014

#### Do you support or oppose implementation?

Support

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

This modification should be implemented immediately to ensure that the legal text of the UNC is accurate and, in particular, that the full intent of the previously implemented UNC Modification 0381 is properly captured. Without such a change, the UNC Modification process and the enforceability of the affected parts of the UNC will be brought into question.

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

No.

#### Self Governance Statement:

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

Yes. Whilst the changes are material, the subject matter has been previously consulted on and been directed for implementation.

#### Relevant Objectives:

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

We agree with the Proposer's view that implementation of the modification proposal will promote "efficiency in the implementation and administration of the Code".

#### Impacts and Costs:

0490S  
Representation  
20 March 2014

Version 1.0

Page 1 of 2

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

None identified.

**Implementation:**

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

The modification should be implemented immediately.

**Legal Text:**

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

Yes.

**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.