

Representation - Draft Modification Report UNC 0600S

Amend obligation for the acceptance of EPDQD revisions made after D+5

Responses invited by: **5pm on 09 March 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Charles Ruffell
Organisation:	RWE Supply & Trading GmbH
Date of Representation:	9 th March 2017
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

We support implementation as it is a pragmatic solution that will amend the UNC to codify current arrangements, ensure National Grid NTS is not in breach of the UNC and not disrupt established CVA processes and timescales to enable accurate shipper allocations to continue to be produced. The modification also includes some proposed actions that go beyond the vires of the UNC, namely with holders of Network Entry Agreements. We also support the proposals in this area.

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

We agree that this modification proposal should be subject to self-governance.

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

Subject to any Appeal, implementation should be sixteen business days after the Panel decision.

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, although we would have preferred 1.4.2(b) to not include National Grid discretion over acceptance of revisions made after D+5 but before M+15.

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

None.