

Representation - Draft Modification Report 0592

Separation of National Grid Transmission and Distribution owned networks – Transitional invoicing arrangements

Responses invited by: **5pm on 02 September 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Hilary Chapman
Organisation:	SGN
Date of Representation:	1 st September 2016
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

SGN supports this modification and considers that it creates a pragmatic, short-term invoicing solution which minimises impacts to industry parties arising as a result of the sale of NGG's distribution assets.

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

SGN supports the self-governance status of this modification.

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

We would support implementation at the earliest possible date following a Modification Panel decision in order to provide the industry with certainty and stability.

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

None identified.

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

Yes

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.

N/A

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

N/A