

Representation

Draft Modification Report

0375 – Changes to how Unsecured Credit Limits are determined within UNC TPD Section V 3.1.7 (Independent Assessments)

Consultation close out date: 09 December 2011

Respond to: enquiries@gasgovernance.co.uk

Organisation: **Scotland & Southern Gas Networks (SGN)**

Representative: Erika Melén

Date of Representation: 09 December 2011

Do you support or oppose implementation?

Support

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

The current arrangement for assigning a credit rating for shippers as introduced by UNC Modification 0304 have resulted in the rating determined by the Independent Assessment rarely being used for smaller shippers. SGN agree with the proposer that removing the "lesser of rule" and utilising the Independent Assessment value represents an appropriate method of credit rating determination.

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

No

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the proposer that this modification will better facilitate relevant objective (f) as it is essentially removing a redundant process from the UNC

Impacts and Costs:

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

None

0375

Representation

09 December 2011

Version 1.0

Page 1 of 2

© 2011 all rights reserved

Implementation:

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

None

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