Representation - Draft Modification Report UNC 0792S Amendments to Cost Recovery under OAD

Responses invited by: 5pm on 13 May 2022

To: enquiries@gasgovernance.co.uk

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

Representative:	David Mitchell
Organisation:	Scotland Gas Networks Ltd and Southern Gas Networks Ltd
Date of Representation:	13 th May 2022
Support or oppose implementation?	Support
Relevant Objective:	f) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

SGN is supportive of this modification as it will update the Offtake Arrangements Document (OAD) to allow operators to agree cost recovery in advance of works taking place currently no such provisions exist therefore we welcome this inclusion in the OAD.

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

We support the decision to make this a self-governance modification on the basis that it is a Transporter to Transporter code change that won't impact customers.

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

SGN would like to see a three month lead time to allow us time to amend our internal processes to accommodate this amended process.

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

SGN does not expect to any additional costs as a result of implementing this modification.

Joint Office of Gas Transporters

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

We are satisfied with the proposed legal text.

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.

None identified

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

N/A