Representation - Draft Modification Report UNC 0815S

DSC Committee Quoracy

Responses invited by: 5pm on 08 December 2022

To: <u>enquiries@gasgovernance.co.uk</u>

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

| Representative: | Sally Hardman |
|------------------------------------------------|-------------------------------------------------|
| Organisation: | Scotland Gas Networks and Southern Gas Networks |
| Date of Representation: | 7 th December 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 supports the intent of Modification 0815S to facilitate the continued quoracy of the Data Services Contract Committees. The modification furthers the relevant objective f) Promotion of efficiency in the implementation and administration of the Code.

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

SGN supports the view that this modification should be self-governance on the basis that this change provides minimal impact.

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

We support the proposed implementation of sixteen business days after approval to implement as per self-governance procedures.

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?

We are satisfied that the legal text will deliver the intent of the modification.

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.

We note that the final Modification/Modification Report continue to indicate within the *Purpose of the Modification* and *Section 3 Why Change?* that voting is proposed to align to that of UNC Panel arrangements. It is however clearly indicated in the solution and that of the legal text that the amendments to exclude Transporters from the proposal to reduce minimum quoracy from three to two has been reflected.

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

None.