








UNC Workgroup Report	At what stage is this document in the process?								
<h1>UNC 0862:</h1> <h2>Amendments to the current Unidentified Gas Reconciliation Period arrangements</h2>	<table border="1"><tr><td>01</td><td>Modification</td></tr><tr><td>02</td><td>Workgroup Report</td></tr><tr><td>03</td><td>Draft Modification Report</td></tr><tr><td>04</td><td>Final Modification Report</td></tr></table>	01	Modification	02	Workgroup Report	03	Draft Modification Report	04	Final Modification Report
01	Modification								
02	Workgroup Report								
03	Draft Modification Report								
04	Final Modification Report								
<p><b>Purpose of Modification:</b></p> <p>This Modification proposes amendments to the current Unidentified Gas Reconciliation Period arrangements to reconcile UIG to the same months that the energy originated from (instead of smear over previous 12 months).</p>									
<p><b>Next Steps:</b></p> <p>The Workgroup recommends that this Modification should not be subject to Self-Governance. The Workgroup asks Panel to agree that this Modification should proceed to consultation. The Panel will consider this Workgroup Report on 18 July 2024. The Panel will consider the recommendations and determine the appropriate next steps.</p>									
<p><b>Impacted Parties:</b></p> <p>High: Shippers, Distribution Network Operators, Consumers, Central Data Services Provider (CDSP)</p> <p>None: Independent Gas Transporters and National Gas Transmission</p>									
<p><b>Impacted Codes:</b> <del>Retail Energy Code (REC)</del>   <del>GT UNC (TBC)</del></p>									

**Commented [DS1]:** To review and confirm once legal text available.

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3	Why Change?	4	 0121 288 2107
4	Code Specific Matters	4	Proposer: Steve Mulinganie SEFE Energy
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Timetable			
<b>Modification timetable:</b>			
Pre-Modification Discussed		06 July 2023	
Date Modification Raised		27 October 2023	
New Modification to be considered by Modification Panel		16 November 2023	
First Workgroup Meeting		23 November 2023	
Workgroup Report to be presented to Modification Panel		18 July 2024	
Draft Modification Report issued for Consultation		19 July 2024	
Consultation Close-out for representations		8 August 2024	
Final Modification Report available for Modification Panel		12 September 2024	
Modification Panel recommendation		<u>19 September 2024</u>	

Commented [DS2]: Timings updated to reflect July Workgroup Report extension.

## 1 Summary

### What

Currently UNC states that the UIG Reconciliation Period is the period of 12 months ending with (and including) the Reconciliation Billing Period. (UNC TPD Section E - 7)

As a result, a Shipper is responsible for a percentage (%) of the UIG amendment for a site for 12 Months for the period of its ownership

This was put in place originally, because it was believed the majority of reconciliations would flow within 12 months, and rather than continue to share out the reconciliations over a long period, using 12 months would be less of a barrier to exiting the market.

In practical terms if a site is taken over by a new Shipper or a Shipper leaves the market, the outgoing Shipper will still be responsible for the UIG charge on the amendment invoice for the site for 12 months, although this will gradually decrease over the 12-month period.

This arrangement does mean that UIG reconciliation is smeared equally across the previous 12 months (equally divided into 1/12 per month) rather than reconciling against the same month the energy originated from. If a change is not made, then the Unidentified Gas Reconciliation will continue to be smeared to the last 12 months instead of to the same months that the energy originated from, which is inherently more accurate and fairer than the existing arrangements.

### Why

If a change is not made, then the Unidentified Gas Reconciliation will continue to be smeared to the last 12 months instead of to the same months that the energy originated from.

An increased number of supply meter points are being read on a monthly basis which means that the 12 monthly smear of UIG is now less accurate than it was historically.

When a party does seek to leave the market, the current 12 monthly smear of UIG means that their share of UIG does not always match their original allocations.

This Modification seeks to resolve the above points by amending the UIG reconciliation period to ensure that UIG is reconciled in the same month that the energy originated from, potentially mitigating the above discrepancies in how UIG is currently allocated.

### How

The Proposal is therefore to reconcile UIG to the same months that the energy originated from (instead of smearing to the last 12 months) which is inherently more accurate and fairer than the existing arrangements

## 2 Governance

### Justification for Authority Direction

This change is material as it has a significant commercial impact on parties, consumers, or other stakeholder(s); and therefore warrants Authority Direction

### Requested Next Steps

This Modification should be considered a material change and not subject to Self-Governance.

## Workgroup's Assessment

The Workgroup agreed with the Proposers assessment that Authority Direction is warranted for this Modification.

### 3 Why Change?

If a change is not made, then Unidentified Gas Reconciliation will continue to be smeared to the last 12 months instead of to the same months that the energy originated from. Due to the increase in monthly read sites, reconciling UIG in the month the energy originated from, means UIG reconciliation will be more accurate.

### 4 Code Specific Matters

#### Reference Documents

UNC TPD Section E – 7 <https://www.gasgovernance.co.uk/index.php/TPD>

#### Knowledge/Skills

Understanding of current UIG reconciliation process - <https://www.xoserve.com/help-centre/demand-attribution/unidentified-gas-uiq/>.

### 5 Solution

The Business Rule(s) (BRs) are set out below:

**BR1:** Reconcile UIG to the same months that the energy originated from.

~~**BR2:** This change is to the UIG reconciliation period and **will not** result in changes to meter point reconciliation calculations and associated processes.~~

BR1 Note 1: The solution would not expect invoicing to be at Meter Point Level and the current invoicing format would be simply extended to cover the additional months.

BR1 Note 2: The solution expects that UIG would continue to be reconciled back to Line in the Sand to ensure that no UIG is left unaccounted for.

BR1: Note 3: For the avoidance of doubt other than an amendment to the UIG reconciliation period as set out in BR1, meter point reconciliation calculations and all other processes associated with UIG reconciliation are to remain the same.

BR1: Note 4: For the avoidance of doubt, UIG will be reconciled across the whole of the month that the energy originated from. Reconciliation will not be limited to the exact dates that month that the energy originated from.

**BR 1 Note 5:** For the avoidance of doubt it is anticipated that the new UIG Reconciliation Period will be effective from the Modification implementation date. For avoidance of doubt, this means that no transitional arrangements to implement this Modification will be required.

**BR 1 Note 6:** For the avoidance of doubt, LDZ Offtake Reconciliations, as defined in UNC TPD E7.3 and other offline reconciliation processes that currently feed the UIG smear will adhere to the new logic. This means that they will be calculated for the impacted months (which could include months from the current billing month back to the LIS date). This is anticipated to happen as a result of updating the UIG Reconciliation Period stated within TPD E.7.1.2.

**Commented [DS3]:** Amended to reflect latest version of the Modification:  
BR2 removed  
New BR1 clarification note 5 and 6 added

## 6 Impacts & Other Considerations

### Does this Modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No.

### Consumer Impacts

The existing arrangements lead to the smearing of UIG over the last 12 months despite it relating to a different period and this is a difficult concept to explain and to forecast for Consumers.

### What is the current consumer experience and what would the new consumer experience be?

As noted above, the outcome should be a more logical process with an outcome that is more accurate and easily understood by Consumers.

#### Impact of the change on Consumer Benefit Areas:

Area	Identified impact
Improved safety and reliability	None
Lower bills than would otherwise be the case	None
Reduced environmental damage	None
Improved quality of service	None
Benefits for society as a whole	None

### Performance Assurance Considerations

Workgroup participants did not believe there was any settlement impact that the PAC would need to consider.

### Cross-Code Impacts

[Potential iGT UNC impact – to be confirmed once legal text produced and reviewed.]

### EU Code Impacts

None.


The Workgroup agreed with the proposer's view that there would be no EU Code Impact.

### Central Systems Impacts

From a system perspective, the CDSP will be required to reconcile UIG to the same months that the energy originated from (instead of smearing to the last 12 months).

[A set of slides produced by the CDSP in February 2024, providing an example of the As-is and To-be UIG reconciliation apportionment process have also been included below to provide further context and to aid understanding:]

**Commented [DS4]:** CDSP slides added to provide further context and to aid understanding.



**UNC Modification 0862**  
Amendments to the current Unidentified Gas Reconciliation Period arrangements

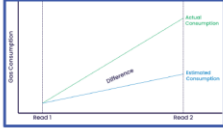
Example of As-Is and To-Be UIG Reconciliation Apportionment Updated Following February 2024 Workgroup Meeting

### Additional Context Slide

- Unidentified Gas (UIG) is the balancing figure in each LDZ each day
- UIG = Total LDZ throughput less Shrinkage less Daily Metered (DM) actuals/estimates less Non-Daily Metered (NDM) deemed usage (using the NDM Algorithm)**
- Subsequently the individual positions are refined by meter point reconciliation – e.g. DM check reads, actual readings for NDM sites
- Each time an individual meter point position changes, this must mean that the UIG position has changed, to keep the LDZ figures "in balance"
- Updating the UIG position after the initial D+5 close-out is referred to as UIG Reconciliation
- These slides describe the As-Is arrangements for UIG Reconciliation and the proposals in UNC Modification 0862

### Background

- Under current "Project Nexus" business rules, UIG Reconciliation (charge type "UGR") is shared out in a standard 12-month "pot" in each LDZ
- How is this currently carried out?
  - Each month, the CDSP carries out reconciliation activities for sites which have submitted reads in that billing month
  - The submitted reads indicate the difference between estimated and actual consumption

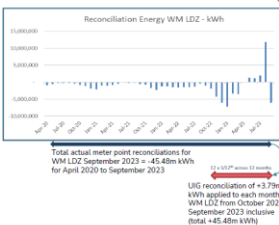


**12-month pot means:**

- Total UGR divided into 12ths
- Then allocated to the previous 12 months in 12 separate 'chunks'

### Background cont.

- How is this currently carried out?
- The difference in energy consumption for each site is then smeared across the reconciliation period (read date to read date) and billed/credited to the appropriate Shipper
- Opposite value of all the reconciliations in the LDZ for that billing month are totalled up to become UGR



### Background cont.

- Whether the original rec was for 3 days, 3 months or 3 years, the UGR is currently shared out across the 12-months pot in that LDZ
- UGR is currently applied to latest share of Weighted Shipper throughput for the last 12 months in the relevant LDZ
- The only exception is Large LDZ Measurement errors (>50 GWh – see UNC TPD E7.5) which are applied to the actual historic months – back to line in the Sand only (the "Code-Cut-Off Date" – see UNC General Terms C1)
- All UGR is shared out – none is "lost" due to the use of a 12-month pot

### Modification 0862

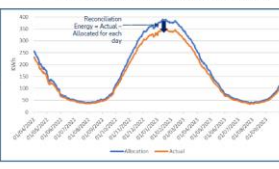
- UNC Modification 0862 seeks to move away from the standard 12-month pot for normal UIG Reconciliation
- Instead UIG reconciliation would be apportioned – still within each LDZ – across the same whole months as the meter point reconciliation that has caused it
- That could be anything from one month to 48 months – and could be just recent months or just older historic months (e.g. for re-reconciliations)
- Most meter point reconciliation now flows in the first four months after the allocation month ("Supply Month") – Mod 0862 would align the UIG reconciliation to original allocation months
- The Mod does not propose any changes to meter point reconciliation processes

### Why Was 12 Months Chosen Originally?

- Prior to Project Nexus all Smaller Supply Points were subject to "Reconciliation by Difference" in place of meter point reconciliation
- Energy sharing rules depended on the type of the original reconciliation – 12 months was the longest sharing period (except for Large LDZ measurement errors)
- 12 months was chosen by the Project Nexus Workgroup on the basis that:
  - Most sites would get a read at least once a year so 12 months would represent a typical reconciliation period
  - A single "pot" was simpler to understand
  - An outgoing Shipper would still be responsible for the UIG charge on the amendment invoice for the site for 12 months
  - It would be less of a barrier for Shippers wishing to exit the market
- UIG was expected to be a small % of throughput and UIG Reconciliation was expected to be a small proportion of the original UIG
- Project Nexus UNC Workgroup stated at the time that the rules could be revisited in the future

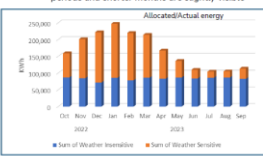
### Worked Example

- Reconciliation energy = Actual – Allocated = -8.961 kWh in this example
- UIG reconciliation = +8.961 kWh
- Higher energy volumes in high allocation months



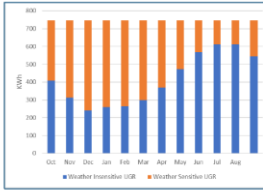
### As-Is Processes

- Consider a fictitious LDZ with just 2 customer groups:
  - 1m kWh of Weather Sensitive AQ (e.g. Domestic, small I&C with heating load)
  - 1m kWh of Weather Insensitive AQ (e.g. Industrial process load)
- For Gas Year 2022 this is the comparative allocated/actual energy position – basis of UGR allocation



### As-Is UGR sharing

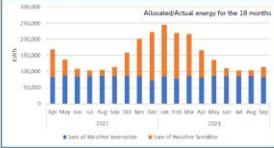
- The monthly amount of UGR is always the same (1/12th)
- Weather sensitive sites pick up a greater share in the colder months, less in summer



**Proposed Approach**

- The example rec of 18 months would create UGR to be shared over 18 months
- 6 extra "older" months would be in play for UGR
- The latest post-reconciliation energy for these 18 months will be Weighted and used as the basis of UGR sharing

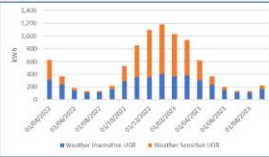
- This is a view of the latest energy in our fictitious LDZ for the 18-month period
- Diagram updated to add the missing data for April 2022



**Proposed UGR sharing**

- The post-reconciliation energy for these 18 months will be Weighted and used as the basis of UGR sharing
- The monthly UGR amounts vary in line with the original meter point reconciliation
- Total UIG Rec = +8,951 kWh – no change to energy or financial values

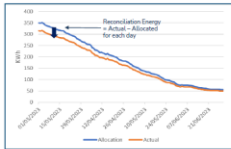
- Sharing of UGR in line with the meter point reconciliation energy across the reconciliation period



**Additional slides – Example of a 4-month reconciliation**

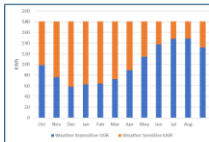
- Previous slides showed a reconciliation for a period longer than 12 months
- Recent data from the Amendment Invoice shows that most reconciliation takes place within the first 4 months
- There are many more monthly read sites now compared to at Project Nexus implementation
- This extra example shows a 4-month reconciliation period for March to June 2023, processed on the September 2023 invoice

- Reconciliation energy = Actual – Allocated = -2,170 kWh in this example
- UIG reconciliation = +2,170 kWh
- Reconciliation relates to March to June 2023

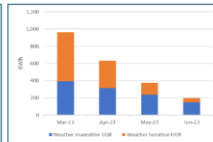


**Additional slides – Example of a 4-month reconciliation**

**As-Is UIG reconciliation – 12 month sharing**



**To-Be UIG reconciliation – 4 month sharing**



- Example uses the same fictional LDZ and shares of throughput
- UIG reconciliation = +2,170 kWh in both cases, but in To-Be example is only shared over the months that the original Reconciliation related to: March to June 2023 for this example

**Financial Implications of UIG Reconciliation**

- The financial value of UGR is taken from the sum of all the original meter point reconciliations in each LDZ (UGR E value is the equal and opposite of all the meter point rec E values – they net each other out on the Amendment Invoice)
- UIG Reconciliation is not revalued using the SAP prices of the months that it is shared over
- Financial values would be shared out in parallel with the energy amounts under Mod 0862 as explained earlier
- A change to the sharing arrangements won't have any impact on the overall financial value of UGR
- UIG Rec is an energy-only charge – there are no transportation charges on UIG so there is no Transporter income impact from the proposed change

**Other points to note**

- We have not applied any UIG Weighting Factors to these examples – to make them easier to understand
- Future use of UIG Weighting Factors was confirmed by Ofgem's decision to reject UNC Mods 0831/A
- UGR each month is dependent on the individual reconciliations for the month within the LDZ
- In reality there are up to 39 End User Categories in each LDZ, each with a different profile and weather sensitivity
- Historic data can be seen in the "Reconciliation by Month" report on the Xoserve UIG page – report shows sum of individual recs in energy and E terms – reverse them to get UGR energy kWh and E value – "Supply Month" means the actual months to which the recs related: [Unidentified Gas \(UIG\) | xoserve.com](#) (pre-Line-in-the-Sand energy appears on the report but can be ignored)

**Rough Order of Magnitude (ROM) Assessment (Cost estimate from CDSP)**

Cost estimate from CDSP where the Modification relates to a change to a CDSP Service Document

The Workgroup noted that a preliminary ROM had been produced given the early stage of the request. A further ROM may be produced after the Modification has undergone more development at the Workgroup. [Verify with CDSP / Workgroup whether a further ROM is required?]

A preliminary ROM was provided by the CDSP for discussion at the January Workgroup meeting and an updated version with minor amendments was provided by the CDSP for discussion at the April Workgroup meeting.

**Rough Order of Magnitude (ROM) Assessment (Workgroup assessment of costs & lead times)**

An enduring solution will cost at least £130k, but probably not more than £250k.

Cost estimate from CDSP

No ongoing costs are anticipated but this will be confirmed at detailed design.

Insert Subheading here

Insert text here

Commented [DS5]: To be updated following April Workgroup discussion.

## Initial Representations

None Received.

## Panel Questions

None raised.

## Workgroup Impact Assessment

The Modification has been discussed at the following Workgroup meetings:

- <https://www.gasgovernance.co.uk/0862/231123>
- <https://www.gasgovernance.co.uk/0862/250124>
- <https://www.gasgovernance.co.uk/0862/220224>
- <https://www.gasgovernance.co.uk/0862/280324>
- [Add April / May links as necessary]

### November Workgroup Meeting (23 November 2023)

The Proposer observed that the Modification was simple in concept and just had the one Business Rule (BR) – to amend the current UIG reconciliation arrangements to reconcile UIG to the same months that the energy originated from (instead of smearing over the previous 12 months).

However, both the Proposer and Workgroup noted that the complexity of the change was likely to be in the execution. The Proposer noted that the current arrangements are likely a legacy of the arrangements from Nexus, with the complexity at the time likely to be one of the reasons why the approach was taken to smear the UIG charge over the last 12 months.

The CDSP had reviewed the BR in advance of the meeting and the 'BR Notes' in the 'Solution' section above are a result of this review.

The Workgroup noted that further analysis would be needed to determine the potential impact of the Modification on Central Systems and processes and that December would likely be too soon for the CDSP to undertake this analysis. The Workgroup agreed that the next meeting should be deferred to January with an action placed on the CDSP to consider the best delivery path for this Modification and any transitional arrangements likely to be required.

The Workgroup also considered if there would be impacts resulting in additional costs for the DNOs to be passed on to Shippers and suppliers. It was noted that UIG is an energy only cost, without Transportation elements and the same amount of UIG would be attributed, so any costs would be just central system expenditure.

### January Workgroup Meeting (24 January 2024)

A change tracked version of the Modification was shared with the Workgroup, incorporating some further clarification points to BR1.

The Workgroup reviewed the updated Modification, noting that there did not appear to be any material changes. The Business Rules remained relatively simple and the Proposer noted that the plan was that further detail will be provided in the form of a presentation at the February Workgroup meeting, looking at the 'As-is' and 'To-be' process.

The CDSP advised that a preliminary ROM had been produced, noting that a revised ROM may be required after the Modification had undergone further development at Workgroup.



The CDSP noted that currently, the way in which UIG is reconciled involves taking it and splitting it into 12 periods, each month there is a UIG reconciliation. Under the change proposed by the Modification, the UIG reconciliation would occur from a meter read occurrence, not necessarily within the 12-month process. The CDSP advised that on the surface the change should be relatively simple as Modification 0862 seeks to change the period that the Unidentified Gas Reconciliation is allocated against but does not seek to change any other element of how Unidentified Gas is reconciled.

In relation to the implementation of the Modification, the CDSP advised they were looking into whether this would be a big-bang approach or whether a transitional arrangement will need to be put in place. The big-bang approach is considered the best and easiest route as there would be no requirement for transitional rules. Further, in relation to implementation, there is wide range for the costs. This is because CDSP does not anticipate ongoing costs. Further information relating to costs will be confirmed during the Detailed Design.

Further BR development was deferred until the February Workgroup meeting.

#### February Workgroup Meeting (24 February 2024)

The main focus of the February Workgroup meeting was a set of slides presented by the CDSP, providing some worked examples of the “As Is” and “To-be” UIG Reconciliation Apportionment process.

Workgroup participants recommended that the presentation slides be included as an Annex to the Modification, to provide context and to aid understanding. **A copy of the slides has been included within the ‘Central System Impacts’ section above**

The CDSP began by providing some background to the current process and how it is carried out, noting that under the current business rules, UIG Reconciliation (charge type “UGR”) is shared out in a standard 12-month “pot” in each LDZ.

The CDSP provided an overview of the changes to the process being proposed by Modification 0862, noting that the Modification seeks to move away from the standard 12-month pot for normal UIG reconciliation. Instead, UIG Reconciliation would be apportioned across the same whole months as the meter point reconciliation that caused it, which could be anything from one month to 48 months.

The CDSP then presented a worked example of a fictional reconciliation for a weather-sensitive site for an 18-month period. This example showed how reconciliation processes assign the actual energy in proportion to the original allocation. I.e. proportionally more reconciled energy is associated to winter months than to summer months.

The CDSP also presented a further worked example of a fictitious LDZ with just two customer groups, one with weather sensitive data and the other with weather insensitive data. This example compared how UGR would be shared under the current arrangements, and under the approach proposed by Modification 0862. The example demonstrated how, under the proposed approach, the UGR would be shared out over 18 months, with monthly UGR amounts varying in line with the original meter point reconciliation.

The Proposer and Workgroup participants thanked the CDSP for presenting the examples, noting that they are very useful in aiding understanding of the process. The Proposer suggested that inclusion of an additional, 4-month example could also be useful to highlight the difference between the current and the proposed process. The CDSP agreed and took an action to provide an updated presentation with a new, 4-month example included.

The Workgroup agreed that the proposed Business Rules are ready for the development of Legal Text and the Joint Office took an action to submit a formal Legal Text request to Cadent at the March UNC Panel meeting.

#### March Workgroup Meeting (28 March 2024)

Commented [DS6]: Summary of main areas of March Workgroup discussions added, as per Minutes.

The Proposer noted that following feedback from the CDSP, some changes to the Business Rules and supporting clarification notes had been made to provide additional clarity, and that an updated version of the Modification would be provided. The following amended text was shared with the Workgroup:

- Removal of BR2: 'This Change is to the UIG reconciliation period and will not result in changes to meter point reconciliation.' It was noted that BR2 is covered within BR1 Note 3 and therefore is not needed.
- Addition of BR1 Note 5: For the avoidance of doubt, it is anticipated that the new UIG Reconciliation Period will be effective from the Modification implementation date. For avoidance of doubt, this means that no transitional arrangements to implement this Modification will be required.
- Addition of BR1 Note 6: For the avoidance of doubt, LDZ Offtake Reconciliations, as defined in the UNC TPD E7.3 and other reconciliation processes that currently feed the UIG smear will adhere to the new logic. This means that they will be calculated for the impacted months (which could include months from the current billing month back to the LIS date). This is anticipated to happen as a result of update the UIG Reconciliation Period stated within TPD E.7.1.2.

Workgroup participants agreed that the changes were likely to provide additional clarity for the Legal Text provider.

The Chair then shared the draft Workgroup Report with the Workgroup, highlighting areas where further discussion or amendment may be needed. A high level summary of the main discussion points is provided below:

- The Workgroup noted that there may be a consequential impact to the iGT UNC but that this would be subject to confirmation once Legal Text had been produced.
- The Chair noted that a preliminary Rough Order of Magnitude (ROM) had been produced, questioning whether a further ROM was required. The CDSP advised that nothing had changed since the preliminary ROM, suggesting that the provisional statement and reference to further ROM could be removed and the preliminary ROM would be resubmitted.
- The Workgroup discussed the inclusion of the CDSP Annex slides within the Workgroup Report. It was agreed that each slide should be included as they provide further context to the Modification.

The Workgroup noted that the next steps would be to review the legal text, the updated Modification and the updated Workgroup Report, before determining the timeline for implementation of the Modification.

#### April Workgroup Meeting (25 April 2024)

[Add commentary post meeting]

#### May Workgroup Meeting (25 April 2024)

[Add commentary post meeting]

#### Reference Documents

None.

## 7 Relevant Objectives

### Impact of the Modification on the Transporters' Relevant Objectives:

Relevant Objective	Identified impact
--------------------	-------------------

a) Efficient and economic operation of the pipe-line system.	None
b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.	None
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	Positive
e) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers.	None
f) Promotion of efficiency in the implementation and administration of the Code.	None
g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

**Proposer's view**

The Modification furthers Relevant Objective d) Securing of effective competition:

- (i) between relevant shippers.
- (ii) between relevant suppliers; and/or
- (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.

As it reconciles UIG to the same months that the energy originated from (instead of smearing over the previous 12 months) it better reflects the Shippers actual position thereby furthering effective competition.

**Workgroup Assessment of Relevant Objectives**

Workgroup participants agreed with the Proposers assessment above in relation to Relevant Objective d).

**8 Implementation**

No implementation timescales are proposed. However, this Modification should be implemented as soon as reasonably practicable following Authority direction to do so. [\[verify with workgroup at the appropriate point\]](#)

**9 Legal Text**

*Insert Proposers Suggested Legal Text where provided and not superseded by Transporters Text.*

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*Legal text will be drawn up by the relevant Transporter at a time when the modification is sufficiently developed in line with the [Legal Text Guidance Document](#).*

Legal Text has been provided by Cadent and is [\[included below/published alongside this report\]](#).

### Workgroup Assessment

[\[The Workgroup has considered the Legal Text and is satisfied that it meets the intent of the Solution. – verify with workgroup at the appropriate point\]](#)

### Text Commentary

[\[Insert text/link here.\]](#)

### Text

[\[Insert text/link here.\]](#)~~Insert text here.~~

## 10 Recommendations

### Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that this Modification should proceed to consultation.

## 11 Appended Representations

Initial Representations – none