

## Representation

### Draft Modification Report

#### Modification Report UNC 0656: Changes to Modification Panel arrangements

1. **Consultation close out date:** 11<sup>th</sup> October 2018
2. **Respond to:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)
3. **Organisation:** Gazprom Energy  
5<sup>th</sup> Floor  
8 First Street  
Manchester  
M15 4RP
4. **Representative:** Steve Mulinganie  
Regulation Manager  
[stevemulinganie@gazprom-mt.com](mailto:stevemulinganie@gazprom-mt.com)  
0799 097 2568
5. **Date of Representation:** 8<sup>th</sup> October 2018
6. **Do you support or oppose Implementation:**  
We **Support** implementation of the Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**  
We raised this modification to address a number of governance issues in relation to the UNC Modification Panel arrangements. During its development we refined our proposals based on feedback from colleagues and also increased its scope to recognise additional proposals put forward as a result of discussions.
8. **Are there any new or additional Issues for the Modification Report:**  
No
9. **Self-Governance Statement Do you agree with the status?**  
Not Applicable

**10. Relevant Objectives:**

*How would implementation of this modification impact the relevant objectives?*

We believe that this modification is **positive in respect of Relevant Objective (f)** as it puts in place appropriate assurances to avoid any risk of a conflict appointment in relation to the transparent operation of Panel, as well as clarifying the arrangements for Alternates to ensure appropriate representation at meetings and maintaining the effectiveness of Panel.

**11. Impacts & Costs:**

*What analysis, development and on-going costs would you face if this modification was implemented?*

We **have not** identified any significant costs associated with this modification

**12. Implementation:**

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

We would like to see the modification **implemented as soon as reasonably practicable**

**13. Legal Text:**

*Are you satisfied that the legal text will deliver the intent of the modification?*

We have **no** comments on the Legal Text provided.

**14. Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or you wish to emphasise.*

No