

Representation - Draft Modification Report UNC 0736S

Clarificatory change to the AQ amendment process within TPD G2.3

Responses invited by: **5pm on 10 December 2020**

To: enquiries@gasgovernance.co.uk

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

Representative:	Oorlagh Chapman
Organisation:	Centrica
Date of Representation:	09/12/2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

This modification would amend UNC to ensure 'reason code 3' is used in the intention it was developed, only allowing AQ amendments to be processed following a switch of Supply Point from one Shipper to another unrelated Shipper.

We believe this will avoid future charges being unfairly socialised across industry parties where organisations have incorrectly made use of this process. This would therefore further Relevant Objective d) Securing of effective competition.

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

We agree that this modification should be subject to self-governance procedures.

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

We believe this modification could be implemented as soon as possible after UNC Panel approval, to prevent any further misuse of 'reason code 3'.

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 believe the intention of the Solution will be delivered by the 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