

Representation - Draft Modification Report UNC 0776S

Revision of the Modification Panel Meeting Location Requirement in the Modification Rules

Responses invited by: **5pm on 11 November 2021**

To: enquiries@gasgovernance.co.uk

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

Representative:	Phil Lucas
Organisation:	National Grid NTS
Date of Representation:	4 th November 2021
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)

As the proposer, National Grid NTS supports the implementation of this Modification Proposal.

The existing constraint on the location of meetings of the Modification Panel has been in place since 1996 but is no longer necessary considering more flexible working arrangements for individuals and a wider geographical spread of individuals' work locations. Further, removal of the constraint of hosting meetings in London will enhance the ability of the UNC Code Administrator to optimise code administration costs.

On this basis we continue to believe that implementation would better facilitate the Relevant objective of the promotion of efficiency in the implementation and administration of the Code.

Self-Governance Statement:

We remain of the opinion that the Modification Proposal does not have any material impact to the UNC and therefore application of self-governance procedures to this Proposal is entirely appropriate.

Implementation:

Implementation is sought as soon as practicable following the decision to implement the Proposal. As Self-Governance procedures are applicable, implementation could be

sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

Impacts and Costs:

National Grid is not expected to incur any specific additional costs as a consequence of the implementation of this Proposal.

Legal Text:

We are satisfied that the legal text delivers the intent of the solution identified in this Proposal.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

We have not identified any such errors or omissions.

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

Not applicable.