

Representation - Draft Modification Report UNC 0685

Amendment of the UNC term 'Gas Deficit Warning' to 'Gas Balancing Notification'

Responses invited by: **5pm on 21 May 2019**

To: enquiries@gasgovernance.co.uk

Representative:	Edward Ewan Fyfe
Organisation:	Scotland Gas Networks and Southern Gas Networks
Date of Representation:	21 st May 2019
Support or oppose implementation?	Qualified Support
Relevant Objective:	<p>a) Positive</p> <p>e) Positive</p>

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

SGN offers qualified support for this Modification. In general, we are supportive of the name change, and feel that 'Gas Balancing Notification' will in the future not be subject to the negative media coverage that the 'Gas Deficit Warning' faced following the events on 1st March 2018. However, SGN feels this change may not necessarily make a difference to how much additional gas is made available in time of a crises.

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

Considering the significance of the events around the issuing of the 'Gas Deficit Warning' on 1st March 2018, and the subsequent media coverage, SGN recommends that this Modification should be sent for Authority Direction.

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

Implementation by 1st October 2019 is supported where possible, bearing in mind there may need to be changes to the wording of licence conditions, website content, etc.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

No SGN costs or system development has been identified.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

We agree that the legal text provided would deliver the solution set out in the modification proposal.

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

None to add.