Representation - Draft Modification Report UNC 0695S

Obligations on Shippers to pass Transporter compensation payments on to consumers, via Suppliers

Responses invited by: 5pm on 10 October 2019

To: enquiries@gasgovernance.co.uk

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

Representative:	David Mitchell
Organisation:	Scotland Gas Network and Southern Gas Networks
Date of Representation:	10 th October 2019
Support or oppose implementation?	Support
Relevant Objective:	c) Positive
	f) Positive

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

SGN supports this modification as it will introduce a 10 Business Days window for Shippers to pass on consumer compensation payments into the UNC. Whilst we believe that payments are already passed on by Shippers in a timely manor this modification will set clear targets for making payments which will be good for consumers.

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

We agree that this modification fulfils the criteria for self-governance.

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

Implementation could be within 16 days of a panel decision.

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

No direct impacts or costs to SGN's systems have been identified. To ensure that Xoserve's systems can fulfil the modification requirements DSC Change XRN4896 has been raised.

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

We believe that the legal text fulfils the intent of the solution.

Joint Office of Gas Transporters

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.

We haven't identified any omissions in the modification report.

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

SGN does not have any additional analysis or information to include in this representation.