

## Representation - Draft Modification Report UNC 0683S

### Offtake Arrangements Document (OAD) Review Updates – Phase 1

**Responses invited by: 5pm on 07 May 2020**

**To:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Louise McGoldrick
<b>Organisation:</b>	National Grid NTS
<b>Date of Representation:</b>	
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<p>a) Positive</p> <p>b) Positive</p> <p>f) Positive</p>

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

This modification has been raised following development work carried out within 0646R Review of the Offtake Arrangements Document (OAD) workgroup as the OAD has broadly remained unchanged since inception. National Grid considers that the Modification furthers the Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code by providing clarity in the UNC regarding the requirements as mentioned below.

- **Site Security:** under certain scenarios the expectation is that the Site User will be responsible for site security, current OAD obligations currently prohibits this and therefore a change and clarity to the existing obligations is required.
- **Closed NTS to LDZ site and Shared sites (no offtake):** this provides definitions and clarity when these sites in exceptional circumstances may be required to flow gas.
- **Incorporation of the new OAD Template Agreement document** will enable Connection Facilities and other assets to be documented in line with Workgroup discussions.
- **Tripartite Sites:** enables the site services party to sign onto the Supplemental Agreement when there are multiple Site Users at an Offtake site.

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

National Grid NTS supports this Modification remaining as self-governance.

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

Implementation could be 16 business days after a Modification Panel decision to implement, subject to no appeal being raised. As outlined in the transitional text and the Workgroup Report the gradual migration to the proposed OAD Template Agreement will be managed on a bi-lateral basis between National Grid and each of the Distribution Networks.

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

No additional costs have been identified.

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

Yes

**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.*

No

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

N/A