

Representation - Draft Modification Report UNC 0827S

Amending the Unsecured Credit Table in TPD V3 to reflect the removal of Graydons and insertion of Creditsafe

Responses invited by: **5pm on 10 January 2023**

To: enquiries@gasgovernance.co.uk

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

Representative:	Sam Lyons
Organisation:	Wales & West Utilities
Date of Representation:	19 December 2022
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)

Graydon has been acquired by Creditsafe and the Graydon platform will no longer be available for use. As we cannot continue to offer Graydon reports as a credit option, it is necessary to provide an alternative independent credit rating agency to maintain the three separate options for shippers to obtain unsecured credit via an independent assessment under UNC. WWU therefore supports this modification and agrees that it furthers relevant objective (f) promotion of efficiency in the implementation and administration of the code.

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

The Self-Governance Statement provides an accurate summary of why the change is required and we agree that the impact of the modification should be non-material. We agree the solution is the correct action. We also support the two housekeeping changes.

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

Use of the Graydon portal has been withdrawn following the conclusion of our contract with them. Therefore, we would like to see this MOD implemented at the earliest opportunity so we can begin to offer Creditsafe as a viable option under UNC. However, we agree with the usual sixteen-day implementation notice period for a self-governance modification.

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

This change requires switching from one service provider to another, so there is no discernible impact or additional cost of making this switch.

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

Nothing further to add.