

## Representation - Draft Modification Report UNC 0829S

## Updates to the Supplemental Agreement Amendments Process

Responses invited by: **5pm on 06 June 2023**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>	David Mitchell
<b>Organisation:</b>	Scotland Gas Networks and Southern Gas Networks Ltd
<b>Date of Representation:</b>	31 <sup>st</sup> May 2023
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

SGN Supports this modification as we acknowledge that the process for updating Supplemental Agreements has evolved since it was first introduced in 2005. This modification has been raised to address the recommendations of review group 0646R "Review of the Offtake Arrangements Documents". We believe that moving existing arrangements that are in the Offtake Arrangements Document into a subsidiary document that will require approval by the Offtake Committee rather than requiring formal modification should allow parties to make amendments to the process more efficiently in the future.

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

We agree with the justification for self-governance as we don't believe that this modification will have a material impact on consumers or competition.

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

This modification could be implemented sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

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

SGN does not anticipate any impacts or costs as a result of this modification being implemented.

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

We are satisfied with the legal text.

**Modification Panel Members have requested that the following questions are addressed:**

*Q1: Are there consequential issues for inflight projects to move to the new process?*

It would be beneficial to manage in-flight projects under the current regime otherwise we may need to visit site again in order to bring the projects in line with the revised process. Projects that commence after the implementation of this modification should be subject to the new arrangements.

**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**

N/A.