

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

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

Representative:	Shiv Singh
Organisation:	Cadent
Date of Representation:	8 th June 2023
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)

The proposal addresses the concerns raised at the Request Workgroup 0646R – Review of the Offtake Arrangements Document and transfers the relevant arrangements into a new subsidiary document allowing for more timely revisions. This should result in a more efficient process.

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

We agree that the proposal satisfies the Self-governance requirements.

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

Implementation can take place as per current guidelines following a Panel decision to approve as 'in-flight' projects will not be subject to the new arrangements, but rather follow existing provisions.

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

None.

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

Yes. Please see additional notes below.

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?

Projects that are 'in-flight' should continue to be managed under the regime under which they commenced. New projects agreed after the implementation date would 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.*

No.

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

During the consultation period for 0829, it has been highlighted that the proposed legal text is based upon a section of UNC that will also be amended by UNC0834S (Inclusion of the "Process for the Update and Retention of Shared Site Drawings" as a Subsidiary Document within the Offtake Arrangements Document). Although these modification proposals run in parallel, 0834 is due to be implemented on 12th June and therefore, 0829 requires amending.

To clarify, the proposed text for both modifications seek to introduce a new provision under OAD N1.2.1(h). As 0834 will be implemented first, the numbering for the text in 0829 has been adjusted accordingly.

An updated Legal Text (& Commentary) have been submitted to the Joint Office, to be presented at June Panel.

Thank you to WWU for bringing this to our attention.