

Representation - Draft Modification Report UNC 0736S

Clarificatory change to the AQ amendment process within TPD G2.3

Responses invited by: 5pm on 10 December 2020

To: enquiries@gasgovernance.co.uk

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

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities
Date of Representation:	10 th December 2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

We support this Modification Proposal because it closes a loophole in the UNC that enables a Shipper organisation to transfer Supply Meter Points from one legal entity to another within the same organisation and to amend the Annual Quantity. As the proposal clearly explains this was the intention of the AQ amendment process implemented under Project Nexus was only to allow this in exceptional circumstances. This Modification Proposal therefore furthers relevant objective (d) (i) *Securing of effective competition between relevant shippers.*

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

We agree that this Modification Proposals satisfies the self-governance criteria.

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

This modification can be implemented 16 business days from a Modification Panel determination subject to no appeal being raised.

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.

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