

Representation - Draft Modification Report UNC 0651 Changes to the Retrospective Data Update provisions

Responses invited by: **5pm on 09 August 2018**

To: enquiries@gasgovernance.co.uk

Representative:	Beverley Viney
Organisation:	National Grid
Date of Representation:	7 August 2018
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

We support 0651 as we believe the solution proposed is proportionate to the issue based on data made available to the CDSP by Shippers. The provisions in the UNC introduced as part of Modification 0434 Project Nexus – Retrospective Adjustments are currently unimplemented in systems and we believe Modification 0651 provides a more proportionate solution to address the issue, and this solution can be implemented in a reasonable timescale.

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

We agree with the proposer that this proposal should be considered a material change and not subject to self-governance.

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

We agree that the implementation date should be guided by the recommendation of the DSC change committee, as work is required by the CDSP to allow implementation of this proposal

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

National Grid would not need to spend on our own internal systems or processes.

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