

Representation - Draft Modification Report UNC 0708S

Re-ordering of the UNC in advance of Faster Switching

Responses invited by: 5pm on 07 May 2020

To: enquiries@gasgovernance.co.uk

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

Representative:	Phil Lucas
Organisation:	National Grid NTS
Date of Representation:	7 th May 2020
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

The implementation of faster switching arrangements will materially change the governance of the change of supplier process and ultimately result in the removal of the Supply Point transfer rules from TPD Section G for the majority of Supply Points. Whilst this Proposal does not seek to achieve this, implementation would re-order this section into a more logical sequence and migrate a small number of additional terms into more appropriate sections of the UNC.

This Proposal does not advocate any change to the rights and obligations of parties under the Code. Nonetheless, National Grid recognises that the proposed re-ordering will provide administrative benefits ahead of, and during, the eventual implementation of the Faster Switching arrangements and therefore agrees that implementation of this re-ordering would better facilitate relevant objective f) efficiency in the implementation and administration of the Code.

Self-Governance Statement:

Given the absence of proposed change to the rights and obligations of Code parties which will therefore have no material effect on parties or arrangements, National Grid agrees that the Proposal is suitable for self-governance.

Implementation:

National Grid does not require any specific lead time for implementation.

Impacts and Costs:

National Grid will not incur any analysis, development or ongoing costs as a consequence of implementation.

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

We welcome the due diligence exercises undertaken by both Northern Gas Networks (NGN) and the Joint Office of Gas Transporters (as outlined in the NGN covering letter published by the Joint Office on 3rd April 2020) to verify that legal text achieves the stated objective of the Proposal to merely re-order the relevant section of the UNC.

On the basis of the above, National Grid is satisfied that the legal text delivers the intent of the Proposal.

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.*

National Grid has not identified any such errors or omissions.

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

N/A