

Representation - Draft Modification Report UNC 0683S

Offtake Arrangements Document (OAD) Review Updates – Phase 1

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:	David Mitchell
Organisation:	Scotland Gas Networks and Southern Gas Networks
Date of Representation:	6 th May 2020
Support or oppose implementation?	Support
Relevant Objective:	a) Positive b) Positive f) Positive

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

SGN is supportive of this modification as it will update several areas of the Offtakes Arrangement Document (OAD) that have not been amended since 2005. The changes that are being made will enhance the Supplemental Agreements that are in place between parties and will enhance the management of the records that are shared between parties and will help alleviate ambiguity by adding clarity to several areas of the Offtake Arrangements Document namely Tripartite Arrangements, Shared Sites while a new section of the Offtake Arrangements Document will be added to include Critical National Infrastructure site arrangements which will allow parties to meet their obligations.

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

This modification proposal meets the self-governance procedures on the basis that the changes will have no material impact on the Shippers or Gas Consumers. The changes being proposed will bring the Code in line with industry changes that have taken place since 2005.

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

We agree with the proposed implementation lead time of sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised. We do however note that this modification proposes a gradual migration of sites from the

existing supplemental agreements to the new Supplemental Agreement templates which is something that we support as we believe that it is an economic use of resources.

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

No additional costs to SGN have been identified.

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

We have nothing else to add to the legal text that has been proposed.

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.*

We are not aware of any errors or omissions in the final modification report.

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

SGN does not have any additional analysis to add to our representation.