

Joint Office

Enquiries@gasgovernance.co.uk

06 May 2020

Dear Sir or Madam,

Re: 0708S Re-ordering of the UNC in advance of Faster Switching

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

NGN supports this Modification Proposal.

Reason for support/opposition:

Please summarise (in one paragraph) the key reason(s)

We support this proposal as the re-ordering of the Uniform Network Code (UNC) to match the baseline legal text for Ofgem's Faster Switching programme should ensure that it is easier to identify proposals which impact the Faster Switching Significant Code Review (SCR). This proposal also gives parties the opportunity to make necessary internal compliance reference updates ahead of the Faster Switching implementation, thus furthering Relevant Objective f) *promotion of efficiency in the implementation and administration of the Code.*

Self-Governance Statement:

Please provide your views on the self-governance statement.

This proposal should follow self-governance procedures as it is only seeking to re-order existing sections of the UNC in preparation for Ofgem's Faster Switching programme and proposes no changes to party obligations, rights, competition or UNC governance.

Implementation:

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

This proposal could be implemented sixteen business days after Panel approval, subject to no appeal being raised; however, we believe it would be beneficial for this to be in line with the relevant changes to the IGT UNC and UNC Validation Rules.

Impacts and Costs:

What analysis, development and ongoing costs would you face?

No analysis, development or ongoing costs to NGN have been identified as a result of this proposal.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the Solution?

We believe the legal text provided should deliver the Solution set out in the modification.

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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.

None identified.

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

None.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Tracey Saunders (via email)
Market Services Manager (Industry Codes)
Mobile: 07580 215 743

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