

Representation - Draft Modification Report UNC 0713S

Amendments to TPD V3.1.7 Independent Assessment table

Responses invited by: **5pm on 02 April 2020**

To: enquiries@gasgovernance.co.uk

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

Representative:	Sue Davies
Organisation:	Wales & West Utilities
Date of Representation:	30 th March 2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive f) Positive

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

We support this modification as it restores the number of usable independent assessment credit ratings to three agencies following the roll out of a new Graydon rating platform with a different rating methodology. It therefore furthers relevant objectives (d) competition between Shippers by providing three options and (f) management of Code by removing information that is no longer relevant

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

We support self-governance as this is effectively an updating of Code to reflect changes but does not qualify as Fast Track because there was an element of choice in how the replacement of the current ratings by the new ratings was done.

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

As this is a Self-Governance modification implementation can be 16 business days after a panel decision subject to no appeal being raised.

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

No costs will be incurred.

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