

## Representation - Draft Modification Report UNC 0792S Amendments to Cost Recovery under OAD

Responses invited by: **5pm on 13 May 2022**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Louise McGoldrick
<b>Organisation:</b>	National Grid NTS
<b>Date of Representation:</b>	13 <sup>th</sup> May 2022
<b>Support or oppose implementation?</b>	Comments
<b>Relevant Objective:</b>	f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

National Grid NTS comments for the Modification are: The provision of an estimate and the ability to revise estimates will improve transparency of cost recovery between Transporters. With the inclusion of the 60 business day period to submit a notice for unforeseen costs after completion of work at an Offtake Site will potentially ensure that additional costs can still be recovered. It is our understanding that it is not the intention of the Modification to limit the Recovering Party from invoicing actual costs incurred, however our preference would have been to have included a caveat which enabled actual costs to be recovered irrespective of any prior agreement or estimates.

It's noted that the Offtake Arrangements Document already has provisions stating under what circumstances cost recovery can be pursued and how actual costs are invoiced.

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

Self-governance is appropriate as it meets the self-governance criteria.

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

We note that in terms of implementation that we will need to put in place new processes to support the provision of an estimate/revised estimates on an enduring basis and therefore suggest in the event of a Modification Panel decision to implement is made that the legal text should be implemented 3 months later.

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

National Grid NTS would not incur any costs as a consequence of implementation.

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

National Grid NTS is satisfied that the legal text will deliver the intent of the solution.

**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**

No.