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02nd November 2017
Your Reference: UNC Modification Proposal 0625

UNC Modification Proposal 0625 - Extension of 4 months to 10 months to transfer non-mandatory sites from Class 1

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal for which Cadent has provided comments.

Do you support or oppose implementation?

Comments

Relevant Objective: f)

Reason for support/opposition:

Cadent understands the drivers for this Modification Proposal which we believe to some extent have merit. However we note that the removal of the DMV category of Supply Point was first proposed in 2011 and has been the subject of 3 UNC Modifications¹ the first to establish the requirement to eliminate the DMV category and the second and third then to extend the effective date for the arrangements for reasons associated with Project Nexus implementation. Each Modification was approved by Ofgem and implemented. Whether a further extension as proposed by this Modification is justified is questionable and indeed we fear that once the latest transition period expires a further

¹ <https://www.gasgovernance.co.uk/0345>
<https://www.gasgovernance.co.uk/0441>
<https://www.gasgovernance.co.uk/0514>

modification may appear although of course we have no evidence as to the likelihood of this. However, we recognise that Unidentified Gas (UIG) is a major industry concern and a priority. Therefore on this occasion we are prepared to accept that the requirement for change should this Modification not be implemented may serve as a distraction to resolving the immediate issue. Consequently, given the limited applicable timescale which applies we do not oppose this Modification.

Self-Governance Statement:

We agree that this Modification represents a material change and therefore should not be subject to self-governance.

Implementation

This Modification Proposal can be implemented with immediate effect.

Impacts and Costs

No impacts or costs have been identified.

Legal Text

Cadent is satisfied that the legal drafting and supporting text commentary contained within the Draft Modification Report meets the requirements and intent of the Modification.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

We have not identified any errors or omissions.

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

Not applicable.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 07778 150668 (chris.warner@cadentgas.com) should you require any further information.

Yours sincerely,

Chris Warner
Industry Codes Manager, Regulation & External Affairs