

Representation - Modification Report UNC 0735VS

UNC Changes as a consequence of the United Kingdom's exit from the European Union

Responses invited by: **5pm on 11 February 2021**

To: enquiries@gasgovernance.co.uk

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

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities
Date of Representation:	11 th February 2021
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

The consultation is aimed at establishing if the content/effect of the variation have caused you to change a view that you previously expressed, or to take a view that you had not previously considered. Please note any representation received in respect of Modification 0735S will be carried forward should parties not wish to change their original representation.

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

We support this modification as it makes necessary changes to the UNC to reflect the UK's status as a non-member of the European Union.

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

We support self-governance as although changes to the modification rules would normally require an Authority Decision modification this is not appropriate for this modification.

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

As Self Governance procedures are proposed, implementation would be no sooner than sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

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

None.

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

WWU does not believe that this varied modification should have been re-issued for consultation as the solution and legal text are unchanged. We accept that the variation changed the title changed and some of the text in the Summary section; however, we have had several modifications over the years where the title was not a good reflection of the content. We agree that titles should reflect the contents but panel has no powers to require this and the proposer could have decided not varied the modification and the only recourse Panel would have had would be to vote that new issues had been raised.