

## Representation

### Draft Modification Report

#### 0372 – Code Governance Review Licence Compliance Changes

**Consultation close out date:** 02 September 2011  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** **National Grid Transmission**  
**Representative:** Chris Shanley  
**Date of Representation:** 30 August 2011

#### Do you support or oppose implementation?

Support

#### Please summarise (in one paragraph) the key reason(s) for your support/opposition.

This proposal aims to implement the changes required to address the licence compliance concerns raised by the Authority in their decision letters for the suite of Code Governance Review (CGR) Modification Proposals (0318 – 0325V). National Grid Transmission believes that, if implemented this proposal will better facilitate the efficient discharge of our license obligations and provide a number of administrative efficiencies as the changes will improve consistency between the major industry codes.

#### Are there any new or additional issues that you believe should be recorded in the Modification Report?

No.

#### Self Governance Statement:

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

Yes.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

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National Grid Transmission believes that implementation of Modification Proposal 0372 will better facilitate the achievement of Relevant Objectives c and f.

c) Efficient discharge of the licensee's obligations. We believe that the Proposal better facilitates the efficient discharge by the licensee of the obligations imposed upon it following the CGR, under Standard Special Condition A11. Network Code and Uniform Network Code, of the Gas Transporters' Licence.

f) Promotion of efficiency in the implementation and administration of the Code. We believe that this Modification Proposal will better facilitate this relevant objective by providing a number of administrative efficiencies as the changes will improve consistency between the major industry codes, providing clarity to smaller parties and consumer representatives who may otherwise be restricted in their ability to fully participate in the UNC processes.

### **Impacts and Costs:**

*What analysis, development and ongoing costs would you face if this modification were implemented?*

None.

### **Implementation:**

*What lead-time would you wish to see prior to this modification being implemented, and why?*

### **Legal Text:**

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

Yes. However, a few very minor typos have been identified with the Suggested Text and a revised version has been published with this response.

### **Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*

No.