

## Representation

### Draft Modification Report

#### 0372V: Code Governance Review Licence Compliance Changes

**Consultation close out date:** 04 November 2011  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** Scottish Power  
**Representative:** Gerry Hoggan  
**Date of Representation:** 04 November 2011

#### Do you support or oppose implementation?

Support/Qualified Support/Neutral/Not in Support/Comments\* *delete as appropriate*

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

One of the major objectives of the Code Governance Review was to improve cross code consistency. Accordingly, we believe that addressing the concerns expressed by Ofgem in their earlier decision letters on Suite of Proposals that were raised to implement the Industry Code Governance Review, namely Modifications 0318 – 0325V, is prudent and would be worthwhile in facilitating that objective. We believe that the draft Modification Report successfully achieves that goal and so we are happy to support it.

#### 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?*

We agree with the assessment in the Modification Report that relevant objectives (c) - Efficient discharge of the licensee's obligations – and (f) - Promotion of efficiency in the implementation and administration of the Code – would be better facilitated.

**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?*

We are comfortable with the lead-time proposed in the Modification Report.

**Legal Text:**

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

Yes

**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