

Representation

Draft Modification Report

0384S: UNC Modification Rules; housekeeping, clarity and minor drafting changes

Consultation close out date: 07 September 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: **Scotland & Southern Gas Networks**

Representative: Erika Melén

Date of Representation: 06 September 2012

Do you support or oppose implementation?

Support

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

This modification looks to clarify several issues and make some housekeeping changes to the Modification Rules.

SGN are in support of the housekeeping changes as well as the amendments made to the legal text provision sections.

However, we are not overly supportive of the change to the text in regards to the majority voting as this will remove Panel members ability to abstain from a vote without physically leaving the room which would not only be a disruption but could also leave the Panel non-quorate in certain cases.

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?

0384S

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06 September 2012

Version 1.0

Page 1 of 2

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Yes

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

As stated above, a majority of the changes proposed by this modification will better facilitate Relevant Objective (f) in promoting efficiency of the code. However the "clarification" of the voting arrangements will cause physical disruption in meetings if members are forced to leave the room to abstain as well as potentially leaving meetings non-quorate.

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?

The 16 business days as per self governance arrangements

Legal Text:

Are you satisfied that the legal text [and the proposed ACS (see www.gasgovernance.co.uk/proposedACS)] 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