

## Representation

### Draft Modification Report

#### 0433S: Inclusion of the Transmission to Distribution “System Operator Agreement Guidelines” within the Offtake Arrangements Document

**Consultation close out date:** 07 June 2013

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** Scotland & Southern Gas Networks

**Representative:** David Mitchell

**Date of Representation:** 07 June 2013

#### Do you support or oppose implementation?

Support

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

SGN supports moving the Transmission Systems Operator to Distribution Systems Operator Agreement Guidelines to the Offtake Subsidiary Documents within Section N 1.2. We can see the potential benefits of moving the governance to the OAD as we can see the advantages of this coming under the governance of the Offtake Committee. We are also supportive of removing references to SOMSA as we acknowledge that this is no longer applicable.

#### 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?*

We agree with the Modification Panel that this modification fulfils the requirements of a self governance modification, due to that fact that there will be no impact on customers or competition.

#### Relevant Objectives:

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

Giving the Transmission Systems Operator to Distribution Systems Operator Agreement Guidelines visibility in the UNC provides an efficient means of managing changes to the document, as parties will be able to use the existing change management framework that exists.

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#### Impacts and Costs:

Version 1.0

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

SGN does not envisage any costs through the implementation of this modification, but we believe that there maybe some administrative costs.

**Implementation:**

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

The standard lead time for self governance modifications of 16 days should be applied.

**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.*

N/A