

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: Wales & West Utilities
Representative: Robert Cameron-Higgs
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.

The proposal formalises the existing “System Operator Agreement Guidelines” as an OAD subsidiary document which allows for easier governance of this document in the future.

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?

Objective (f) is satisfied as the proposal supports improved administration of data flows by reference to an OAD document

Impacts and Costs:

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

Minimal process costs

Implementation:

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

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We agree with the stated number of business days in the Modification.

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