

Representation

Draft Modification Report

0436S: Consequential changes to the UNC resulting from RIIO-T1

Consultation close out date: 15 April 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: National Grid NTS
Representative: Martin Connor
Date of Representation: 10 April 2013

Do you support or oppose implementation?

Support

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

The proposed changes to UNC terminology and some NTS Gas Transporter (GT) licence conditions are required as a consequence of the new RIIO regulatory framework and should therefore be implemented as soon as possible. It is important that the UNC promptly and accurately reflects the new regulatory changes which come into effect from 1st April 2013.

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 - the reason for this view is that the Modification proposes administrative rather than policy changes, and as such clearly meets the criteria for self-governance.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

c) Efficient discharge of the licensee's obligations

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Some of the current references to NTS GT licence conditions in the UNC will become obsolete or incorrect post commencement of RIIO. The Modification will correct these references, promoting the efficient discharge of licensee obligations.

f) **Promotion of efficiency in the implementation and administration of the Code**

The Modification proposes to correct a number of existing licence referencing errors in the UNC, relating to the NTS GT licence. By proposing to amend/correct these references, the Modification promotes efficiency in the implementation and administration of the Code.

Impacts and Costs:

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

National Grid NTS envisages no such costs should this modification be implemented.

Implementation:

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

National Grid NTS believes that the modification should be implemented as soon as possible to ensure that the UNC document remains aligned with the NTS GT licence changes introduced by RIIO T1.

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