

Representation

Draft Modification Report

0448: Aligning UNC with Licence Conditions relating to European legislative change and Alternative Modification Proposals

Consultation close out date: 10 December 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: Gazprom Marketing & Trading Limited
Representative: Ric Lea
Date of Representation: 10 December 2013

Do you support or oppose implementation?

Qualified Support

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

Gazprom Marketing & Trading (GM&T) recognises the requirements for this modification in order to align with European Legislation, and supports it in that vein. Beyond this however GM&T sees no benefit in additional governance control of Ofgem over the UNC.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

None

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

As per modification report

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?

Agree with proposed implementation as soon as possible.

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?

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Version 1.0

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Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

None