

Representation - Draft Modification Report 0592

Separation of National Grid Transmission and Distribution owned networks – Transitional invoicing arrangements

Responses invited by: **5pm on 02 September 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Fergus Healy
Organisation:	National Grid NTS
Date of Representation:	01/09/16
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

National Grid NTS agrees that this modification furthers relevant objective 'f promotion of efficiency in the implementation and administration of the Code', as it provides clarity within the UNC to Shipper Users of how NGG will issue Transportation invoices in a transitional period until separate National Grid NTS and NGGDL invoices can be issued.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

National Grid NTS agrees with the UNC Modification Panel that this modification does not have a material impact on gas customers, contractual arrangements between UNC parties or the commercial activities associated with the shipping of gas and as such should be subject to Self-Governance procedures.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

In line with self-governance procedures, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no appeal being raised.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

N/A

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

None Identified

Please provide below any additional analysis or information to support your representation

None required