

Representation - Draft Modification Report UNC 0596

Implementing CGR3 decisions on Significant Code Reviews and self-governance

Responses invited by: **5pm on 08 December 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Phil Lucas
Organisation:	National Grid NTS
Date of Representation:	8 th December 2016
Support or oppose implementation?	Support
Relevant Objectives:	c) Positive f) Positive

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

National Grid NTS fully supports implementation of this Proposal and agrees with the conclusion of the Workgroup that implementation would better facilitate Relevant Objective c) on the basis that implementation would ensure the UNC Modification Rules would address the requirements of Standard special Condition A11 of the Transporters which was revised as a consequence of Ofgem's Code Governance Review Phase III.

Further, National Grid NTS agrees that implementation would also better facilitate Relevant Objective f) by adding further safeguards to ensure that the appropriate industry entity makes the final decision in respect of Modification Proposals taking account of the materiality of the change.

Self-Governance Statement:

National Grid NTS agrees with the conclusion of the Workgroup that the proposed change to the UNC Modification Rules is sufficiently 'material' from the perspective of the proposed additional powers for Ofgem to raise Modification Proposals in the identified circumstances (or direct the governance of such).

Implementation:

National Grid NTS does not require any specific lead time in order to implement the proposed arrangements in the event of the appropriate direction.

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

National Grid NTS would not be exposed to any analysis, development or additional ongoing costs in the event of implementation.

Legal Text:

National Grid NTS is satisfied that the legal text delivers the intent of the solution advocated by this Modification Proposal.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

National Grid NTS has not identified any such errors or omissions.

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

Not applicable