

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:	Maitrayee Bhowmick-Jewkes
Organisation:	Npower
Date of Representation:	8 th December 2016
Support or oppose implementation?	Oppose
Relevant Objectives:	c) Positive f) Negative

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

Npower agrees that this Modification Proposal will implement changes to the self-governance process whereby modifications follow self-governance procedures as the default unless the UNC Modification Panel determines that the proposal has a material impact according to the existing Self-Governance Criteria. We therefore support relevant objective (c) about this proposal being efficient.

However, npower does not agree with implementing changes to the Significant Code Review (SCR) process as we do not agree with Ofgem raising their own modifications. We feel that relevant objective (f) is impacted negatively by this change, especially in relation to the rights provided to Ofgem to raise and progress modifications, because this could be less efficient than progression by the industry. Therefore, this could also negatively affect objective (c) as well, since Ofgem will have the powers to raise and approve their own modifications, some of which may not be subject to a thorough and robust cost benefit analysis.

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

We do not think that this modification meets the self-governance criteria as it will materially affect code modification procedures.

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

We support the implementation date following Ofgem's decision.

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

None.

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.*

No.

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

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