

Representation - Draft Modification Report UNC 0600S

Amend obligation for the acceptance of EPDQD revisions made after D+5

Responses invited by: **5pm on 09 March 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Gerry Hoggan
Organisation:	ScottishPower Energy Management Limited
Date of Representation:	9 th March 2017
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

We believe that EPDQD allocations that are as accurate as possible are crucial to a robust balancing regime that shippers can have confidence in, and for that reason we have welcomed National Grid's pragmatic practice to this point of making revisions to EPDQD submissions beyond the code prescribed D+5 deadline. In order to avoid any risk of that practice being discontinued for reasons of code compliance we believe that it is appropriate to formalise and codify that practice and for that reason we would support this proposal.

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

We agree with the view expressed in the Workgroup Report that this Modification Proposal is suitable to be progressed via self-governance as it is unlikely to have a material effect on competition between shippers.

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

If approved we see no reason why the change should not be implemented as soon as possible.

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?*

We are satisfied that the proposed legal text will deliver the intent of the Solution.

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.*

We have not identified any errors or omissions in this Modification Report

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

None