

Representation - Draft Modification Report UNC 0736S

Clarificatory change to the AQ amendment process within TPD G2.3

Responses invited by: 5pm on 10 December 2020

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	David Mitchell
Organisation:	Scotland Gas Networks and Southern Gas Networks
Date of Representation:	10 th December 2020
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

SGN supports this modification as it will clarify the circumstances in which a User can apply Reason Code 3 when submitting an AQ amendment. The original intention for Reason Code 3 was to allow new registrations the opportunity to amend their AQ following a switching event from one Shipper to an unrelated Shipper when the reads are found not to be reflective of the AQ recorded in the central systems. This modification will make this intention clear within Uniform Network Code (UNC) that a User within the same organisation, or an Affiliate of the previously Registered User, cannot utilise 'Reason Code 3' to justify an AQ amendment. We believe that relevant objective d "securing effective competition" is fulfilled by making this change as it will clarify consistent application of the AQ amendment rules .

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

As this modification makes a minor amendment to the AQ amendment process and does not impact consumers we believe that it fulfils the requirements for self-governance criteria.

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

This modification requires no Xoserve system changes therefore implementation could be 16 days following approval by Panel subject to no appeals being raised.

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

SGN does not expect to see any development costs from implementing this change.

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

We are satisfied that the legal text reflects the intent of the modification.

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.*

SGN has not identified any errors or omissions in this modification that need to be considered.

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

We have no further comments to add.