

Representation - Draft Modification Report UNC 0779 0779A

0779 - Introduction of Entry Capacity Assignments 0779A - Introduction of Entry Capacity Assignments with Defined End Date

Responses invited by: **5pm on 11 February 2022**

To: enquiries@gasgovernance.co.uk

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

Representative:	Pavanjit Dhesi
Organisation:	Interconnector Limited
Date of Representation:	10/02/22
Support or oppose implementation?	0779 - Support 0779A - Support
Alternate preference:	<i>If either 0779 or 0799A were to be implemented, which would be your preference?</i> 0779A
Relevant Objective:	0779 a) Positive d) Positive 0779A a) Positive d) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

The Uniform Network Code allows for assignment of capacity and liability between Users at Exit Points. Either of these modification proposals will provide users with greater flexibility with respect to entry capacity holdings by enabling assignment of capacity and liability between Users at these points as well (in full or in part). It can therefore further facilitate secondary market trading, use of capacity and reduce the administrative burden on shippers. UNC779A provides additional system flexibility to users, which is why, on balance, it is the preferred proposal.

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

As soon as practicable.

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

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

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Modification Panel Members have requested that the following questions are addressed:

Q1. What are the merits of the alternative Modification 0779A Capacity exclusion aspects?

The alternative UNC 779A provides additional flexibility to system users which should further facilitate the identified objectives a) and d). It allows for notification of capacity assignments up to day ahead of delivery, rather than the original proposal's 5 business days. It is also noted there is no cost difference suggested by the ROM estimation from the provision of the additional flexibility outlined in the UNC779A proposal.

Q2. Do you have any views around redistribution of costs and likelihood of under recovery of costs for National Grid?

Insert Text Here

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.*

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

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