

## Representation - Draft Modification Report UNC 0785

### Application of UNC processes to an aggregated Bacton (exit) Interconnection Point

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

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Malcolm Montgomery
<b>Organisation:</b>	National Grid NTS
<b>Date of Representation:</b>	11 <sup>th</sup> January 2022
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	c) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

As proposer of this modification National Grid NTS supports its implementation. The NGG GT Licence changed on 15<sup>th</sup> December 2021 with the effect of creating a combined Bacton (exit) IP. This modification will confirm how UNC processes (including competing auctions) will be applied to the newly combined point, ensuring (if implemented) a clear alignment between the Licence and the UNC and therefore furthers Relevant Objective (c) – Efficient discharge of the licensee's obligations.

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

As Transporter, we have recently confirmed to industry that we are working towards 1<sup>st</sup> March 2022 for implementation of the solution proposed in this modification. This has been brought forward from the date previously communicated to Transmission Workgroup which was Sep 2022, and minimises the duration of the period between the Licence change and the UNC/systems changes taking effect.

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

Development system costs were identified within Rough Order of Magnitude XRN5420 ROM which was shared with the workgroup and indicated an estimated implementation cost of between £275k and £375k which will be funded by National Grid NTS. No material ongoing costs are identified once the system solution is in place.

**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.*

None.

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

n/a