

Representation - Draft Modification Report UNC 0802S Clarification of 'Annual Update' for impacted Users in relation to CNCCD Election(s)

Responses invited by: 5pm on 07 April 2022

To: enquiries@gasgovernance.co.uk

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

Representative:	Laura Johnson
Organisation:	National Grid NTS
Date of Representation:	07 April 2022
Support or oppose implementation?	Support
Relevant Objective:	f) Positive
Relevant Charging Methodology Objective:	None

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

This UNC Modification proposal clarifies which Users receive the 'annual update' for the Conditional NTS Capacity Charge Discount (CNCCD) product. Should a 'live' election become ineligible, or the discount level is to change for a 'live' election, only those impacted Users will receive an update via the 'annual update'. This process ensures that when an impacted User receives the 'annual update' file, they are informed that something has changed which will impact their CNCCD Election for the following Gas Year and serves as a prompt to consider any actions they may need to take with regards to the impacted 'live' CNCCD Election(s).

Standard Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code is overall furthered as this proposal providing clarity that the 'Annual Updates' would notify only impacted Users where the CNCCD percentage or eligibility has changed for a 'live' CNCCD election. This would enable time for any impacted User to consider their CNCCD election(s) before the start of the next Gas Year. It does not change any calculations for the CNCCD and applicable discount percentage that was implemented in UNC Modification 0728B - Introduction of Conditional Discount for Avoiding Inefficient Bypass of the NTS with 28km distance cap.

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

As set out in the Draft Modification Report, we are of the opinion that application of Self-Governance procedures is appropriate as the Modification only seeks to clarify which

Users receive the 'annual update' for the Conditional NTS Capacity Charge Discount (CNCCD) product.

We therefore believe that the UNC Modification will not have a material impact on consumers, competition, operation of the pipeline systems, matters relating to sustainable development, safety or security of supply, the management of market or network emergencies and will not unduly discriminate between different classes of parties to the UNC.

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

As Self-Governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

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

There are no costs associated with this Modification.

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

We are satisfied that the legal text delivers the intent of the solution identified in this Proposal.

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 such errors or omissions.

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

N/A