

Representation

Draft Modification Report

0443 - Arranging Flow Swaps between NTS/LDZ Offtakes with increased lead times or for prolonged periods

Consultation close out date: 07 June 2013

Respond to: enquiries@gasgovernance.co.uk

Organisation: National Grid NTS

Representative: Andy Hine

Date of Representation: 07 June 2013

Do you support or oppose implementation?

Support

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

National Grid NTS believes that the adoption of this modification will better facilitate the planning of long term outages at LDZ/NTS offtakes. It will provide greater certainty to both the DNO's and National Grid NTS with regards to outages, facilitating the safe and efficient operation of their network whilst also helping minimise any customer disruption.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

None

Self-Governance:

While the Panel decided this is not a Self-Governance Modification, the Proposer subsequently asked for this to be reconsidered. Ofgem has agreed to look at changing this to a Self-Governance Modification if this course of action is supported by consultation responses. What is your view on the suitability of self-governance?

The development process of this modification has addressed the concerns that National Grid NTS originally had with regards to this modification being classed as self governance. The original modification did not place limits on the use of a Long Term Flow Swap which increased the potential for it to impact on other users.

The modification now limits the reasons for a long term flow swap request to 'the safe and efficient operation of the network', under which both parties have the right to justifiably refuse the request. With these safeguards in place, National Grid NTS has no objection to this modification being considered under self governance provisions.

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Version 1.0

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Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the Modification Report assessment of the impact on the relevant objectives.

A more certain approach to planning required outages allows parties to operate their networks in a more co-ordinated, efficient and economic manner, therefore having a positive impact on relevant objectives a) & b).

The ability to plan outages that require longer than one days interruption to service enables network owners to better discharge their obligations under their licences, therefore having a positive impact on relevant objective c).

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

National Grid NTS expects there to be some administration costs attributable to this process (however they are not expected to be excessive)

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

We are happy for this modification to be implemented as soon as is feasible.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

Yes

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

None