

Representation - Draft Modification Report UNC 0696V

Addressing inequities between Capacity booking under the UNC and arrangements set out in relevant NExAs

Responses invited by: **5pm on 15 May 2020**

To: enquiries@gasgovernance.co.uk

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

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| Representative: | Andrew Green |
| Organisation: | Total Gas & Power Ltd |
| Date of Representation: | 15/05/20 |
| Support or oppose implementation? | Support |
| Relevant Objective: | c) Positive f) Positive |

The consultation is aimed at establishing if the content/effect of the variation have caused you to change a view that you previously expressed, or to take a view that you had not previously considered. Please note any representation received in respect of Modification 0696 will be carried forward should parties not wish to change their original representation.

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

We continue to support this modification as per our previous submission and believe that arrangements between Consumers and Transporters under a NEXA should align with the UNC which is a code operating between Shippers and Transporters.

The current arrangements with regard to the interaction of the UNC and Network Exit Agreements (NExA) are inadequate. This has been recognised by both the gas transporters and shippers, both through development of this change and through the attempted raising of alternate proposals to address the contradictions between the two documents. The issue has been recognised as needing to be addressed and this modification achieves that. Creating a clear order of precedent between UNC and NExA arrangements furthers both the administrative efficiency of the code and improving competition by preventing unnecessary costs being incurred by shippers. We believe that retrospection in this case is justified in light of the previous failures of the process and the additional costs that customers have unjustly incurred. The date of September 2018 seems appropriate to strike a balance between protecting historic arrangement and addressing known problems.

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

ASAP

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

None identified

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

We have not reviewed the legal text

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.*

No

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

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