

Representation - Draft Modification Report UNC 0701

Aligning Capacity booking under the UNC and arrangements set out in relevant NExAs

Responses invited by: 5pm 15 May 2020

To: enquiries@gasgovernance.co.uk

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

Representative:	Kirsty Dudley
Organisation:	E.ON
Date of Representation:	14/05/2020
Support or oppose implementation?	Support
Relevant Objective:	<p>a) Positive</p> <p>c) Positive</p> <p>f) Positive</p>

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

E.ON supports this modification as the daily and hourly capacity (both actual and provisional maximins) should not exceed the values of the NExA with the relevant Transporter, which if approved can only be beneficial to the Consumer.

We believe it is pragmatic that the NExA agreement will also be safeguarded by ratchet criteria and Shipper requested capacity increases, by this we mean that a site DM SOQ cannot ratchet above the NExA value, nor can a Shipper increase the capacity over and above what has been agreed in the NExA.

We also agree that where there is only NExA SHQ agreed, that the calculation of the NExA SOQ will be 24 times the NExA SHQ. This makes logical sense as it is the maximum the consumer could ever achieve.

Furthermore, the visibility of linking new and existing NExA agreements within the CDSP will be very valuable information, this is because it introduces a reliable mechanism which can act as an alert to Shippers to the fact that this a NExA is in place and how much additional capacity their Consumers are entitled to.

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

Aligned with the CDSP delivery date with no less than 6 months' notice for implementation.

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

No System Impacts have been identified but training to utilise the CDSP held data will be required, this is not seen to be a project level deliverable.

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

No Comments.

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.*

The solution mentions if there is only SHQ agreed in the NExA then the NExA SOQ will be calculated at 24 times the SHQ. For clarity will Shippers have visibility of whether the NExA SOQ value has been calculated or has been set and agreed by the Consumer?

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

No Comments.