

Representation - Draft Modification Report UNC 0600S

Amend obligation for the acceptance of EPDQD revisions made after D+5

Responses invited by: **5pm on 09 March 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Angharad Williams
Organisation:	National Grid NTS
Date of Representation:	09/03/17
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

If National Grid NTS continues to accept these late revisions without amending code, we risk enforcement action from the regulator. If National Grid no longer accepts these late revisions and enforces the D+5 timescale, this will have an adverse impact on the market because shippers will not receive accurate allocations. Following extensive industry engagement (both UNC parties via the UNC Mod process and non-UNC parties bilaterally), National Grid believes it is in the best interest of the market to continue accepting these late revisions. Therefore UNC needs to be aligned to reflect current practice and the proposed solution represents the best way to achieve this.

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

This modification is proposed as self-governance as it is unlikely to have a material effect on competition in the shipping, transportation or supply of gas conveyed through pipes because it is likely to formally enable only a small subset of the overall EPDQD revisions received. Workgroup participants considered the matter further and the workgroups assessment confirmed there was only a small number of EPDQD revisions received post D+5 (1.5%) and therefore the impact would not be material.

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?*

Accurate data submission will enable accurate shipper allocations, which will ensure accurate costs, and this will ultimately lead to a more competitive environment to the benefit of consumers.

No other impacts or costs were identified as the functionality to implement this process is already available.

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.*

No

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

Please refer to appendix 1 of the Modification.