

Representation

Draft Modification Report

0500 - EU Capacity Regulations - Capacity Allocation Mechanisms with Congestion Management Procedures

Consultation close out date: 19 December 2014

Respond to: enquiries@gasgovernance.co.uk

Organisation: British Gas Trading Limited

Representative: Graham Jack

Date of Representation: 17 December 2014

Do you support or oppose implementation?

Support

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

We fully recognise the requirement to implement the measures set out in this modification proposal to ensure compliance with European network codes and guidelines. The proposal has been developed via regular engagement with stakeholders at European Workgroup meetings and now generally reflects the views and concerns raised by stakeholders during those meetings.

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

None identified.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the assessment set out in the Workgroup Report, namely the furthering of relevant objective g) and charging relevant objective e).

Impacts and Costs:

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

We expect our costs to be low.

Implementation:

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

Implementation should be in sufficient time to ensure compliance with the CAM network code and CMP guideline. Appropriate

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training for users, in processes and systems, should be offered in good time.

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.

We continue to question why the capacity surrender process should, under certain circumstances, allow surrendered bundled capacity to be unbundled and therefore leave a surrendering user with some unbundled capacity that is of no use to it and that is probably of less value than the originally bundled product.