

## 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:** E.ON UK

**Representative:** Richard Fairholme

**Date of Representation:** 19 December 2014

#### Do you support or oppose implementation?

Support

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

We recognise the need for implementation of this Modification to comply with wider European Network Code obligations. We are conscious that this Modification has gone through extensive industry development and is now considered by the Workgroup to be in a position to be implemented.

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

No.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

We agree with the proposer's assessment.

#### Impacts and Costs:

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

We expect some systems and process changes to accommodate the new arrangements, but do not expect these to be significant.

#### Implementation:

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

No particular view.

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Representation  
19 December 2014

Version 1.0

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**Legal Text:**

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

Generally yes, although we note that “Available Interconnection Point Capacity”, a phrase / term which is frequently used throughout the EID Legal Text with capitalised letters, appears not to be included in the “Defined Terms” section of the EID. We believe the Legal Text would benefit from this defined term being included or alternatively it should avoid using a capital “A” for “available”, as “Interconnection Point Capacity” is already defined.

**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.*

No.