

Representation

Draft Modification Report

0426: Amendment to the NTS System Entry Overrun Charge

Consultation close out date: 02 November 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: Total E&P UK Ltd

Representative: Fiona Gowland

Date of Representation: 12th October 2012

Do you support or oppose implementation?

Support

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

Ensuring that a non-zero Overrun Charge applies in all instances of entry overrun should incentivise Users to book sufficient NTS Entry Capacity to cover their gas flow requirements (the 'ticket to ride' principle). Improved signalling of short-term capacity requirements will improve the information provided to National Grid NTS with regards to User's intended use of the NTS. This, in turn, will assist National Grid NTS when planning the operation of the system and will likely facilitate efficient and economic operation. By ensuring that Users pay for the use of the system when no capacity has been booked, implementation of this Modification will likely improve the allocation of costs between Users. We firmly support the fundamental principle behind 'ticket to ride'.

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?

0426

Representation

20 September 2012

Version 1.0

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We believe that implementation will have a positive impact upon:

- a) Efficient and economic operation of the pipe-line system;
- c) Efficient discharge of the licensee's obligations and;
- d) Securing of effective competition

Impacts and Costs:

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

System implementation costs are expected to be between £86k and £102k: we will face a share of the 50% apportioned to Shippers.

Implementation:

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

No lead time required.

Legal Text:

Are you satisfied that the legal text [and the proposed ACS (see www.gasgovernance.co.uk/proposedACS)] 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.

No.