Joint Office of Gas Transporters

Representation – Modification UNC 0700 (Urgent)

Enabling large scale utilisation of Class 3

Responses invited by: 5pm on 07 August 2019

To: enquiries@gasgovernance.co.uk

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

Representative:	Andrew Green
Organisation:	Total Gas & Power Ltd
Date of Representation:	07th August 2019
Support or oppose implementation?	Qualified Support
Relevant Objective:	**f)** Positive

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

We support the aim of this modification which is to provide a solution to prevent the potential failure of the UK Link system which would be unable to process the volume of reads presented under SPC3 based on current projections. We believe this modification provides the best of the currently available options but that due to the very short urgent timescales there remains a lack of clarity in some areas and unanswered questions, particularly around some of the business rules and detail therein such as AQs and read selection and validation. This means that there could be a risk of unintended consequences or implementation issues when these are subsequently worked through by the industry. The solution is proposed as interim but we believe there should be an end date and clarity that current SPC3 functionality will be restored which supports incentives for more frequent read submission and processing. We would not wish to see flip-flopping between processes to manage class 3 (or any other class of reads) should UIG factors change again or be replaced by a different regime in the future which incentivises behaviours not anticipated by the CDSP. The modification only covers changes to SPC3 and not to other classes but yet large scale moves to other classes could happen now or in the future and require capacity (e.g. based on future UIG factor incentives or for any other commercial reasons). Therefore they should also be covered in class change capacity clarifications. We also believe that Mod 664 becomes critical in the context of Mod 700 and therefore must be implemented before Mod 700, or simultaneously.

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

Given the magnitude of the threat to UK Link, as soon as possible. However we are currently unaware of the timescales it would take for CDSP and shippers to make system and process changes so this should be considered.

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

As stated above, there has not been enough clarity for TGP to assess the impacts and costs but there will be IT system and process implications and therefore costs

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

We have not reviewed the Legal Text

Are there any errors or omissions in this Modification that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

Clarification detail around some of the business rules

Potential for mismatches of data between Xoserve and shipper systems

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

None