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| **Representation - Modification UNC 0791 (Urgent)****Contingency Gas Procurement Arrangements when a Supplier acts under a Deed of Undertaking** |
| **Responses invited by: Midday on 24 December 2021****To:** enquiries@gasgovernance.co.uk*Please note submission of your representation confirms your consent for publication/circulation.* |
| **Representative**: |  |
| **Organisation:**  |  |
| **Date of Representation:** |  |
| **Support or oppose implementation?** | Support/Oppose/Qualified Support/Comments*\* delete as appropriate*  |
| **Relevant Objective:** | **a)** Positive/Negative/None*\* delete as appropriate***c)** Positive/Negative/None*\* delete as appropriate***d)** Positive/Negative/None*\* delete as appropriate* |

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

Insert Text Here

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

Insert Text Here

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

Insert Text Here

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

Insert Text Here

Modification Panel Members have requested that the following questions are addressed:

*Q1: CPoSD role start trigger:*

*Do you believe the trigger of 10,000,000 kWh for commencement of the CPoSD role is appropriate? This figure of 10,000,000 kWh is considered to be a reasonable threshold for action to be taken separately to residual balancing, given that the average absolute shipper imbalance on days when no residual balancing trades were undertaken by National Grid NTS over the period 01/10/20 to 30/09/21 was 13.3GWh/day and was 13.1 GWh/day over the same period when the system was short of gas. If not, please justify your answer - do you have an alternative figure and why is this more appropriate?*

Insert Text Here

*Q2:**CPoSD role end trigger:*

*Do you believe the trigger of 100,000 kWh for ending of the role of the CPoSD is appropriate? A minimum volume of 100,000 kWh is proposed because this is approximately the minimum trade quantity available on the OCM. If not, please justify your answer.*

Insert Text Here

*Q3: CPoSD role performance*

*Considering the new role for National Grid NTS of CPoSD and the need for economic and efficiency in decision making, do you believe that the wording in the commentary (see below) relating to UNC Section D 6.3.4 "on an economic basis"*

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| *New paragraph 6.3.4*  | *And when purchasing gas under paragraph 6 National Grid NTS will aim to do so on an economic basis.* |

 *i) has a legal definition,*

*ii) provides sufficient protection to industry or not and*

*iii)* *could have any unintended consequences or not?*

*Please provide an explanation for each response.*

Insert Text Here

i)

ii)

iii)

*Q4*. *CPoSD monitoring and audit*

*Do you have any views on an appropriate monitoring and audit process for this new CPoSD role?*

Insert Text Here

Ofgem have requested that the following questions are addressed:

*Q5*. *What is the likely impact on consumers, industry and the market if the status quo for shipperless sites was maintained this winter (the status quo being National Grid NTS procuring the gas for shipperless sites through Residual Balancing)? Please justify if you think it is necessary to have an alternative solution in place.*

Insert Text Here

*Q6*. *What is the likely impact – both positive benefits and negative consequences/risk - of UNC0791 and the Contingency Gas Procurement Arrangements on consumers, industry and the market?*

Insert Text Here

*Q7*. *What do you see as the costs and/or risks of National Grid NTS operating in markets outside of the OCM in this manner?*

Insert Text Here

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.*

Insert Text Here

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

Insert Text Here