

Representation - Draft Modification Report UNC 0833 (Urgent)

Enabling Demand Side Response (DSR) Market Offers to be made by Non-Trading System Transactions

Responses invited by: **5pm on 02 December 2002**

To: enquiries@gasgovernance.co.uk

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

Representative:	Dan Fittock
Organisation:	Corona Energy
Date of Representation:	01 December 2022
Support or oppose implementation?	Comments
Relevant Objective:	<p>a) Negative</p> <p>b) Positive</p>
Relevant Charging Methodology Objective:	Not Applicable

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

Corona Energy continue to support the principle of the proposed Gas DSR arrangements, however we are disappointed that the Proposer has not taken into consideration the feedback from both Corona Energy's consultation response and the subsequent Panel discussions regarding the applicability of urgency from Modification 0822.

In our response to 0822 we expressed our concerns that the Modification had been raised as urgent even though the proposed Gas DSR scheme was purely voluntary for Shippers, and the lack of any Workgroup consideration resulted in no detailed impact assessment being undertaken.

It appears that as a result of gaps in the solution stemming from the urgent approach taken for 0822, 0833 being raised to fix these gaps that would have been identified if 0822 had followed the usual Modification process - adding both time and expense to a voluntary scheme that some Shippers will not be choosing to adopt for Winter 2022.

We remain cognisant that the intent of both 0822 and 0833 is to aid in the management of voluntary pre NGSE load shedding arrangements, but we maintain (as per our response to 0822) that at a time when Shippers are experiencing significant commercial pressures we do not believe that the liabilities on the Shipper are reflective of the potential benefits and thus would have a negative impact on Relevant Objective A.

Additionally, the use of the urgent Modification process for 0833 means that a detailed impact assessment has still not been undertaken for the Gas DSR scheme and we have concerns that this may result in additional urgent or non-urgent Modifications being raised to fix any other gaps in the Gas DSR solution, all at additional cost to the industry.

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

N/A

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

We maintain that liability impacts to Shippers have still not been adequately assessed. Additionally we have concerns that the lack of a Workgroup assessment will result in further consequential Modifications at further cost to industry for a purely voluntary DSR scheme that may have minimal impacts to NGSE arrangements.

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

N/A

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.*

This Modification has been raised due to omissions from 0822 that would have been achieved if the original Modification did not follow the urgent process. The same risks due to a lack of Workgroup assessment are applicable to 0833.

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

N/A