

## Representation Draft Modification Report

### Modification UNC 0833 (Urgent) Enabling Demand Side Response (DSR) Market Offers to be made by Non-Trading System Transactions

1. **Consultation close out date:** 2<sup>nd</sup> December 2022
2. **Respond to:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)
3. **Organisation:**  
SEFE Energy  
5<sup>th</sup> Floor  
8 First Street  
Manchester  
M15 4RP
4. **Representative:**  
Steve Mulinganie  
Regulation Manager  
[stevemulinganie@sefe-energy.com](mailto:stevemulinganie@sefe-energy.com)  
0799 097 2568
5. **Date of Representation:** 2<sup>nd</sup> December 2022
6. **Do you support or oppose Implementation:**  
We **Support** implementation of the Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**  
We support implementation of this Modification as it removes an obstacle for certain industry parties thus enabling them to be able to participate in the voluntary scheme.
8. **Are there any new or additional Issues for the Modification Report:**  
No
9. **Self-Governance Statement Do you agree with the status?**  
Not Applicable
10. **Relevant Objectives:**  
*How would implementation of this modification impact the relevant objectives?*  
We **agree** with the proposer that this modification is positive in respect of Relevant Objective(s) (a) and (b)

**11. Impacts & Costs:**

*What analysis, development and on-going costs would you face if this modification was implemented?*

We **have not** identified any significant costs associated with the implementation of this modification which simply enables broader participation in DSR.

**12. Implementation:**

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

**ASAP**

**13. Legal Text:**

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

We **have not** reviewed the Legal Text provided.

**14. Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or you wish to emphasise.*

**Yes**

We believe a fuller review of DSR is required ahead of next winter. In particular the relevance of the Shipper role, which is largely facilitatory, in the DSR product. We believe these voluntary DSR arrangements would be better managed bi-laterally between NGrid and Consumers.