

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:	Tom Stuart
Organisation:	Wales & West Utilities
Date of Representation:	01.12.22
Support or oppose implementation?	Comments
Relevant Objective:	
Relevant Charging Methodology Objective:	Not Applicable

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

Given the very short consultation period we have not been able to have a full internal review of our response.

National Grid should consider how DSR amendments are communicated to DNs. This was highlighted during discussions of Mod 822, Reform of Gas Demand Side Response Arrangement.

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

We support the proposed implementation date.

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

There will be some impact on our control room processes as some new information flows between National Grid and DNOs are required.

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

We have not looked at the legal text.

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.*

Some missing detail needs to be developed outside the modification process.

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

There are two issues:

First, how National Grid Gas notifies DNOs that a site is participating in Demand Side Response including when DSR is activated. The DNO needs to know this as it needs to submit accurate demand forecasts to National Grid as part of the usual processes and also because it needs to know the position in case the situation deteriorates into a Gas Supply Emergency.

Second, should the situation deteriorate into a Gas Supply Emergency clear communication will be required between parties involved in Demand Side Response and any subsequent load shedding isolation by the DNO. There may be a scenario where firm load shedding or isolation instigated by the DNO means that when DSR is lifted the site needs to remain off gas. It will be essential that all parties are fully informed about the situation to ensure that the site only starts taking gas when it is safe for them to do so. We need to ensure that processes and communications are clear in this respect.

We have already communicated with National Grid on the above two point and raised the first one shortly after 0822 was published.