

SEFE Energy Representation Draft Modification Report

Modification 0845: Enhancements to Demand Side Response (DSR) Arrangements including a D-5 Product

1. **Consultation close out date:** 13th July 2023
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:**
SEFE Energy
5th Floor
8 First Street
Manchester
M15 4RP
4. **Representative:**
Steve Mulinganie
Regulation Manager
stevemulinganie@sefe-energy.com
0799 097 2568
5. **Date of Representation:** 13th July 2023
6. **Do you support or oppose Implementation:**
We **Support** implementation of this Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
We support the implementation of a D-5 product enabling the potential for greater participation in Demand Side Response.
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) & (b)

11. Consumer Benefits:

Do you have any comments on the Consumer Benefits?

We have no comments

12. 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

13. Implementation:

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

ASAP

14. Legal Text:

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

We **have not** reviewed the legal text but note the workgroups comments

Workgroup Participants considered the text in consolidated and stand-alone form on 5 June following amendments by NGT and Workgroup Participants concluded that the points raised had been addressed and no further points were raised.

15. Modification Panel Questions:

Do you have any comments on any questions raised by the Modification Panel?

We have no comments

16. Performance Assurance Considerations:

Do you have any comments?

Not Applicable

17. 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

Overview of the difference between Customer Direct and Shipper Direct

It would be helpful if we could get a summary and/or table showing differences in process for Shipper Direct and Customer Direct and maybe an operational workshop?

National Gas contacting relevant Shippers

Both Customer and Shipper representatives at the Workgroups expressed concerns over the proposal to not notify the Shipper in the event that a Customer Demand Side Response option is exercised.

17. Continued

We therefore propose in the event that this modification is directed for implementation to bring forward a Modification, at the earliest opportunity, to require National Gas to notify the relevant Shipper

The proposed amendment to the legal text is set out below:

7.9.6 Where National Gas Transmission exercises a Consumer DSR Option it ~~will not~~ inform the Registered User of the Supply Meter Point of the exercise.

Terms and Conditions

We also note that, unlike the Legal Text for Uniform Network Code, the proposed Terms and Conditions between the Customer and National Gas have not been subject to any review by the Work Group which included Customer representation.

In relation to the Terms and Conditions we note the following: -

1. We would question if a Customer should be subject to (b) and (c) below
- 3.2 In complying with the DSR Option the Consumer shall not knowingly or recklessly pursue any course of conduct (either alone or with some other person) which is likely to prejudice:
 - (a) the safe and efficient operation, from day to day, by NGT of the NTS;
 - (b) the safe, economic and efficient balancing by NGT of the NTS; or
 - (c) the due functioning of the arrangements provided for in the UNC.
2. Should 4.2 include provision for where these arrangements no longer apply e.g. termination etc.
3. Is the use of facsimile still relevant?
4. Under Confidentiality we would need to ensure that Customers can advise both existing and potential Shippers and Suppliers of the existence of DSR arrangements does the current wording provide for this?