

Representation - Draft Modification Report UNC 0845

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

Responses invited by: **5pm on 13 July 2023**To: enquiries@gasgovernance.co.uk*Please note submission of your representation confirms your consent for publication/circulation.*

Representative:	David Mitchell
Organisation:	Scotland Gas Networks Ltd & Southern Gas Networks Ltd
Date of Representation:	12 th July 2023
Support or oppose implementation?	Comments
Relevant Objective:	a) Positive b) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

SGN would like to provide comments in respect of this modification proposal. SGN believes that this modification could introduce some useful mechanisms to support the gas network system in times of system stress. Extending the Demand Side Response Arrangements to Class 2 users and allowing them to continue using gas for critical processes seems to be a positive initiative instead of curtailing their supply of gas completely, this may encourage more consumers to take part in the process. We can also see the benefits of the D-5 product when there is a forecast of a supply deficit as the current D-1 product had been cited as a barrier for consumers participating in the process due to the short lead time.

From an SGN perspective our main concern is that we must receive timely notifications when a DSR is triggered on a consumers site as this will help us manage our network planning activities. In addition to this concern, we do have reservations regarding the support that consumers may have when using this process which could act as a barrier to its effectiveness.

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

SGN supports the proposed implementation timescale that have been set out in the draft modification, we believe that it would be advantageous to implement this modification in advance of the winter period 2023/24.

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

SGN does not anticipate any cost as a result of this modification being implemented.

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

We are satisfied with 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.*

None Identified.

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

We do not have any further analysis or information to provide.