

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:	Jeff Chandler
Organisation:	SSE
Date of Representation:	
Support or oppose implementation?	Qualified Support
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)

SSE offers Qualified Support for this proposal as it seeks to enable wider participation of I&C consumers in offering DSR to help to avoid a supply / demand imbalance which may avoid the need to declare a gas deficit supply emergency and firm load shedding.

The proposal allows participation of parties that require a longer notice period (up to D-5) in order to reduce gas offtake.

We agree there may be positive impact on relevant objectives a and b, noting greater uncertainty when calling DSR options at D-5 than day-ahead. However, we are less clear about objective g. In the purchase and use of a balancing service (in this case DSR) and whether this is compliant with the EU balancing code Art 8(1) in relation to the purchase of balancing services and Art 9 1(c) with respect to utilisation. We look forward to Ofgem's decision letter explaining how these condition are met.

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

SSE agrees with the timeline in the modification report.

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

N/A