

## Representation - Draft Modification Report UNC 0753

### Removal of Pricing Disincentives for Secondary Trading of Fixed Price NTS System Entry Capacity

Responses invited by: **5pm on 11 June 2021**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Stephen Parle
<b>Organisation:</b>	PETRONAS UK
<b>Date of Representation:</b>	11 <sup>th</sup> June 2021
<b>Support or oppose implementation?</b>	Oppose
<b>Relevant Objective:</b>	<p><b>c)</b> Negative</p> <p><b>d)</b> Negative</p> <p><b>g)</b> None</p>
<b>Relevant Charging Methodology Objective:</b>	<p><b>c)</b> Negative</p> <p><b>e)</b> None</p>

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

We believe this is a sub optimal approach to the genuine issues that supporters of this Modification have raised.

If implemented as written, it will further exacerbate the uneven playing field between those Shippers who hold existing contracts and those who do not, impacting competition and strengthening the barriers to entry for new participants that already exist as a result of the existing contract concept.

Furthermore, if these contracts are no longer subject to RRC upon transfer, it will reduce the base of customers from whom the revenues would need to be collected, increasing RRC for those customers unable to take advantage and again adding to the dual pricing regime which we have ended up with.

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

N/A

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

See above.

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

**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.*

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