

Joint Office

Enquiries@gasgovernance.co.uk

2nd December 2022

Dear Joint Office,

Re: 0833 (Urgent) - Enabling Demand Side Response (DSR) Market Offers to be made by Non-Trading System Transactions

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

NGN Supports this Modification Proposal, with additional comments.

Reason for support

We support the need for this modification and its intended outcomes as it adds clarity to the UNC in relation the Demand Side Response, and we recognise the benefit to industry this has as a tool to reduce the risk of a Gas Deficit Emergency. This would therefore be positive for relevant objective (a) *efficient and economic operation of the pipeline system*.

Implementation:

As this is under Urgency timelines, this should be implemented on a timeline as stated by Ofgem.

Impacts and Costs:

None identified.

Legal Text:

Due to the urgency timelines, we have not had time to review the legal text.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

The modification appears to make no reference to any mechanism to inform the relevant Distribution Network (DN) of sites that have taken up the DSR product, information that could be required in the event of a Gas Deficit Emergency. Without this information DNs will be unaware whether the Firm Load Shedding order of sites is impacted or may over account for the impact of a site's reduction, due to being unaware that its load is already reduced.

We note that this concern was raised during consultation relating to 0822 (Urgent) - Reform of Gas Demand Side Response Arrangements, and whilst this may not be something that requires inclusion in the legal text (business rule ii), we would at least have expected to have these discussions to have taken place between DNs and NTS, the management of this referred to under system impacts or the 'How' section of the modification proposal.

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

This proposal includes amendments due to drafting oversights as a result of 0822U being under urgency timelines. We therefore would have preferred to have these issues managed again via workgroup discussion to review the

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original modification and the amendments proposed under this, 0833 modification, rather than again under an urgent timeline.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

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Market Services Manager
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