

## Representation - Draft Modification Report UNC 0627S

### Removal of the absolute requirement to include a Remotely Operable Valve (ROV) Installation for all new NTS Exit connections

Responses invited by: **5pm on 07 December 2017**

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

<b>Representative:</b>	Nicola Lond
<b>Organisation:</b>	National Grid Transmission
<b>Date of Representation:</b>	05 December 2017
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	Relevant Objective <b>d)</b> Positive Section Y (Charging Methodology) Modifications <b>b)</b> Positive <b>c)</b> Positive

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

As the Proposer, National Grid NTS fully supports the implementation of the proposal.

National Grid NTS believes that UNC Modification 0627s furthers the relevant objectives as outlined in the Draft Modification Report. In terms of Relevant objective (d) securing of effective competition (i) between relevant shippers, we believe that it is furthered in this case since the modification, if implemented, will facilitate cheaper and simplified connections and access to the NTS opening up potential to new entrants. Additionally the implementation of this Modification furthers the objective of the Project CLoCC Network Innovation Competition project by reducing the time and cost of connection to the National Transmission System (NTS). If implemented, UNC Modification 0627s, will remove the absolute requirement for every new NTS Exit connection to include a Remotely Operable Valve (ROV) Installation and allow National Grid NTS to determine, via an appropriate assessment, whether there is a requirement for a new NTS Exit connection to include a ROV Installation, as part of the connection. This will benefit customers by enabling a reduction in the cost of these connections.

#### Self-Governance Statement: *Please provide your views on the self-governance statement.*

National Grid NTS agrees with the self-governance statement and supports self-governance.

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

National Grid NTS requests that this code modification is implemented as soon as possible. As this modification is self-governance implementation could be sixteen business days after the Modification Panel decision to implement subject to no Appeal being raised.

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

National Grid NTS does not expect there to be any ongoing costs as a result of this modification.

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

National Grid NTS is satisfied that the legal text proposed will deliver the intent of this modification proposal.

**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.*

No

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

N/A