

Representation - Draft Modification Report UNC 0853S

CDSP permissions to facilitate implementation of UNC0701 *(Aligning Capacity booking under the UNC and arrangements set out in relevant NExAs)*

Responses invited by: 5pm on 11 September 2023

To: enquiries@gasgovernance.co.uk

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

Representative:	Tom Stuart
Organisation:	Wales & West Utilities
Date of Representation:	23.08.23
Support or oppose implementation?	Support
Relevant Objective:	a) Positive b) Positive c) Positive f) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

WWU supports this modification as aligning contractually agreed capacity with actual booked capacity will protect the integrity of the Distribution Network and ensure that sites are not paying for capacity that is not available. By including CDSP permissions to carry out capacity reductions within the capacity reduction window, this modification would also ensure that shipper parties are not in breach of code. This was the original intention of Modification 701, however, this modification states the CDSP function more explicitly.

We agree that this modification furthers relevant objectives a) Efficient and economic operation of the pipeline system, b) Coordinated, efficient, and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters, c) Efficient discharge of the licensee's obligations and f) Promotion of efficiency in the implementation and administration of the Code.

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

We agree that this modification should be self-governance.

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

As soon as possible

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

None

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

Yes

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

None