

Representation - Draft Modification Report UNC 0698S

Improvements to Margins Notice Arrangements

Responses invited by: **5pm on 08 August 2019**

To: enquiries@gasgovernance.co.uk

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

Representative:	Terry Burke
Organisation:	Equinor UK Limited
Date of Representation:	6 th August 2019
Support or oppose implementation?	Support
Relevant Objective:	<p>a) Positive</p> <p>b) Positive</p> <p>c) Positive</p>

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

Equinor supports this modification as we believe the industry will benefit from an improved early warning system. The parameters for updating the various components of non-storage supply have been agreed across the workgroup and we believe this will ensure the market responds effectively in times of system stress.

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

We agree with Self Governance as there is no obvious material impact however this change benefits the existing arrangements.

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

Before 1st October 2019 to ensure it is in place for this winter.

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

None identified.

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

We believe the legal text delivers 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.*

None identified

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

Equinor asks that any new “Early Warning Notice” should where possible stand out from the usual notifications which are sent out daily via ANS. Preferably in a different format to make it clear the message is an “Early Warning Notice”.

Once implemented, it would be prudent for National Grid NTS to run an assessment of the previous winter to check the new parameters are working in the way they were designed.