

Representation - Modification UNC 0727 (Urgent)

Increasing the Storage Transmission Capacity Charge Discount to 80%

Responses invited by: **5pm on 26 June 2020**

To: enquiries@gasgovernance.co.uk

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

Representative:	Terry Burke
Organisation:	Equinor
Date of Representation:	26 June 2020
Support or oppose implementation?	Support
Relevant Objectives:	<ul style="list-style-type: none"> a) Positive b) Positive d) Positive e) Positive

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

We agree with the Proposer that the proposed 80% is required to reflect the benefits that gas storage brings to the transmission system. This Modification would reduce the Capacity Charges incurred by the owners of Gas Storage Facilities while avoiding the issue of double charging and supports the wider benefits that storage provides, such as price stability, flexibility and security of supply.

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

1st October 2020

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

Respondents are requested to provide views on the following points:

Q1: Respondents are requested to provide a view as to whether the solution provided within the Modification is fully compliant with the relevant legislation (including, but not limited to, Articles 28-32 of the Tariff Network Code).

Article 28; Consultation on discounts, multipliers and seasonal factors. This modification proposal has gone out to industry consultation so therefore it is compliant with this article.

Regarding Articles 29-32, provided the information is published within the required notice periods this proposal is compliant.

Q2: Respondents are requested to provide views on the proposed implementation date.

1st October 2020 to be in line with the implementation of Mod 678A

Are there any errors or omissions in this Modification that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

None

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

N/A