

Joint Office

enquiries@gasgovernance.co.uk

1st September 2023

Dear Sir or Madam,

Re: 0853 - CDSP permissions to facilitate implementation of UNC0701

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.

Reason for support/opposition:

The visibility and linking of existing and new Network Exit Agreements (NExAs) with central systems, as introduced by UNC Modification 0701 (*Aligning Capacity booking under the UNC and arrangements set out in relevant NExAs*), is intended to ensure that bookings for sites do not exceed the maximum values as stated in the NExA (an agreement between site and Distribution Network), and ensure that Shippers have visibility of where a NExA exists. The original workgroups (and the Ofgem decision) were based around the principle that the introduction of 0701 would ensure that booked capacity did not exceed the maximum value as stated in the NExA. Therefore, the ability for the CDSP to align these values, should the Shipper not do so, should prevent Shippers being in extended breach of the UNC for the misalignment, and prevent sites from paying for capacity that is not available to them. This would therefore be positive for Relevant Objectives a) *efficient and economic operation of the pipe-line 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* (Based on Single MPRN CSEPs also being included), and c) *efficient discharge of the licensee's obligations*.

Additionally, the change of terminology 'Network Exit Agreement' within the section to 'NExA' furthers Relevant Objective f) *promotion of efficiency in the implementation and administration of the Code* by improving consistency of language used within the UNC.

Implementation:

We agree that this modification should be self-governance and that implementation should be on 4th November 2023 to align with the implementation of UNC modification 0701.

Impacts and Costs:

None identified

Legal Text:

We believe that the legal text provided should deliver the Solution set out in the proposal.

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

None identified.

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

None.

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,

Tracey Saunders (via email)
Markets Regulation Manager
Mobile: 07580 215743

Smell gas?

Call the National Gas Emergency
Service on 0800 111 999