Joint Office of Gas Transporters

Representation - Draft Modification Report UNC 0701

Aligning Capacity booking under the UNC and arrangements set out in relevant NExAs

Responses invited by: 5pm 15 May 2020

To: enquiries@gasgovernance.co.uk

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

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities
Date of Representation:	15th May 2020
Support or oppose implementation?	Support
Relevant Objective:	**a)** Positive **c)** Positive **f)** Positive

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

We support implementation because this modification provides a link between capacity agreed between the customer and the Transporter at a Supply Point and the capacity that a Shipper can book for that Class 1 or Class 2 Supply Point. It therefore furthers relevant objective (c) *efficient discharge of the licensee's obligations* as it ties the industry commercial arrangements to the network management arrangements put in place to ensure that the Transporter can operate its system under 1 in 20 conditions. The improvements in information regarding NExAs will further relevant objective (f) *efficient operation and administration of Code*. Together these changes should also further relevant objective (a) *efficient and economic operation of the pipe-line system.*

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

The Draft Modification report states Xoserve estimate that the 20 weeks is required to implement the system changes and they would need to be in a major UK Link release. The next available UK Link release is June 2021 although this is currently earmarked for Faster Switching. The delay to the Faster Switching programme means that the June 2021 release may become available for other changes. In addition, the Covid 19 pandemic means that future major release dates may change. System changes are currently in scope for the November 2021 release. Other changes to the Data Discovery Platform and a data cleanse are also required but will take less than 20 weeks and are not dependent on a major UK Link release.

Our view therefore is that implementation should be in the first available major UK Link release after an Ofgem decision to implement. Given the uncertainties around Ofgem's decision making timetable for non-urgent modifications and the uncertainty over UK Link release dates it is not possible to be more precise about when this date will be.

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

We would bear our share of the Xoserve cost.

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

Originally 0701 was raised as an alternate to 0696; however, panel decided that it was not a true alternate. Since then 0696 has expanded in scope and 0701 has been reduced (for example the scope of the work related to Class 3 and 4 has been reduced from system changes to reporting). Now the key differences between 0701 and 0696V are that 0696V is retrospective and 0701 requires changes to central systems to provide visibility that a customer has a NExA with a Transporter to Shippers as well as reporting for Class 3 and 4 Supply Points with NExAs.

We support 0701 because it links the values in the NExA to the capacity that a Shipper can book for a Supply Point that has a NExA (as does 0606V) but alsomakes changes to Xoserve systems to ensure that this information is visible. We oppose 0696V because it is retrospective. If 0696V had improvements to information flows we would still oppose it because it is retrospective. Our reasons for our opposition to 0696V are set out in more detail to our response to that consultation.