

Representation - Draft Modification Report UNC 0759S

Enhancements to NTS Within-Day Firm Entry and Exit Capacity Allocations

Responses invited by: **5pm on 11 June 2021**

To: enquiries@gasgovernance.co.uk

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

Representative:	Ricky Hill
Organisation:	Centrica Energy Limited
Date of Representation:	11 June 2021
Support or oppose implementation?	Support
Relevant Objective:	a) Positive d) Positive

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

We agree with the proposer that implementation of this modification promotes efficient and economic operation by enabling Shippers to better manage their Firm Entry and Exit Capacity requirements in a timely manner against their actual flow, thereby reducing overcapacity purchases and/or overrun charges. Having shorter lead time to allocation for Exit Capacity and adding an extra hour to the auction windows will reduce the amount of Operational Risk carried within and between shift teams (especially out of business hours), promoting better competition between relevant shippers.

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

Support

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?

We do not envisage any costs for ourselves from this modification.

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 further comments

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

No further comments