

Representation - Draft Modification Report UNC 0805

Introduction of Weekly NTS Exit Capacity Auctions

Responses invited by: **5pm on 12 August 2022**

To: enquiries@gasgovernance.co.uk

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

Representative:	Richard Fairholme
Organisation:	Uniper
Date of Representation:	12/08/2022
Support or oppose implementation?	Support
Relevant Objective:	d) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

This proposal, if implemented, will allow Shipper Exit Users (particularly those with generation and storage) to better align their capacity bookings with actual flows and/or to help minimise risks, which should better facilitate competition in the market. This is particularly important as we head towards Winter.

We believe it is appropriate to exclude DN Users as their needs and economic drivers are materially different.

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

As soon as possible and pre-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?*

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

Nothing further to add.