

Representation - Draft Modification Report UNC 0752

Introduction of Weekly Entry Capacity Auction

Responses invited by: 5pm on 11 May 2021

To: enquiries@gasgovernance.co.uk

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

Representative:	Mark Simons (mark.simons@total.com)
Organisation:	Total Gas & Power
Date of Representation:	4 th May 2021
Support or oppose implementation?	Support
Relevant Objective:	a) None d) None

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

Total Gas & Power believe that Weekly NTS Entry Capacity auctions will allow shippers to book capacity more efficiently, outside of the current Monthly, Daily and Daily Interruptible products.

At some entry points there can be network constraints that lead to National Grid reducing the amount of Daily capacity available for shippers. To mitigate this constraint risk, shippers currently have no other choice than to buy monthly capacity. However if shippers' circumstances then change, following the purchase of monthly, this leads to inefficient allocation of capacity as it is not then available for other shippers to procure. Weekly capacity would address these issues of booking efficiency and allocation of capacity.

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

In light of the substantial price increase to entry capacity products since the implementation of Modification 678A, Total Gas & Power would like this modification implemented as quickly as possible and no later than 1st October 2021.

As Modification 678A applies the same reserve price to all durations of firm entry capacity, there are no price implications for National Grid to address for 752. In addition as 752 only applies to non-interconnection points, the modification does not need to comply with the Tariff Network Code.

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

Total Gas & Power believes that Weekly NTS Entry Capacity auctions will enable more efficient capacity bookings and therefore offer shippers more choice versus booking monthly capacity products.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

Modification Panel Members have requested that the following questions are addressed:

Q1. Do you consider this Modification to be suitable for self-governance procedures?

Yes. The modification does not discriminate against any party and facilitates more choice for users.

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