

## Representation - Draft Modification Report UNC 0793S

### Determination of Charging Area CVs (Daily CVs) – Modification of Calculation Process Arrangements

Responses invited by: **5pm on 11 February 2022**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Phil Lucas
<b>Organisation:</b>	National Grid NTS
<b>Date of Representation:</b>	11 <sup>th</sup> February 2022
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	f) Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

National Grid NTS ('National Grid') is in agreement with the proposer that coincident with the commencement of the new CDSP-provided CV derivation service, the proposed changes would reflect the means by which Distribution Network Operators fulfil their obligation to determine Daily Calorific Values (CVs) for their respective Charging Areas (LDZs) as required by the Gas (Calculation of Thermal Energy) Regulations 1996.

We concur that in doing so, the Relevant Objective of the promotion of efficiency in the implementation and administration of the Code is better facilitated. Specifically, the existing provisions in OAD Section F4 which contains terms which are now effectively redundant, would be revised appropriately.

#### Self-Governance Statement:

We agree that the extent of the proposed changes is not sufficiently material to require a decision being made by the Authority. On this basis we concur that application of self-governance procedures is appropriate.

#### Implementation:

We note that in terms of timing, the Solution section of the Draft Modification Report (Section 5) is predicated on conclusion of the National Grid-provided Interim Service on 31<sup>st</sup> March 2022. However, delays to delivery of the alternative solution by the CDSP has

resulted in DNs seeking an extension of that Interim Service which National Grid has agreed to provide for an additional short finite period.

Accordingly, as noted in the Section 8 of the Draft Modification Report, the implementation date for this Proposal will need to coincide with the revised conclusion of the Interim Service, currently expected at some point between the end of April 2022 and the end of September 2022.

### **Impacts and Costs:**

National Grid would not incur any analysis, development nor ongoing costs as a consequence of implementation.

### **Legal Text:**

#### **Proposed Changes to the TPD and the OAD**

We agree that the proposed changes to these sections of the UNC will deliver the intent of the Solution.

#### **Proposed Changes to the Offtake Communications Document (OCD)**

Section N1.2.1(b) of the OAD sets out that the OCD is an Offtake Subsidiary Document and Section N1.2.6 specifies that a change to an Offtake Subsidiary Document can only be made by a decision of the Offtake Committee (and not otherwise).

Given this, the changes proposed to the OCD cannot be delivered by this Proposal and alternatively require a supportive decision being made by the Offtake Committee.

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

Other than the points noted elsewhere in this representation (regarding implementation timing and the changes proposed to the Offtake Communications Document) we have not identified any further errors or omissions

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

None