

Representation - Draft Modification Report UNC 0605S Amendments to TPD Section K - Additional Methods to Procure and Dispose of Operating Margins Gas

Responses invited by: **5pm on 06 July 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Graham Jack
Organisation:	British Gas Trading Limited
Date of Representation:	03 July 2017
Support or oppose implementation?	Support
Relevant Objective:	c) Positive

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

We agree with the Proposer that there should be shipper, and hence consumer, benefits in allowing National Grid more options for the efficient procurement and disposal of operating margins gas. Concerns over liabilities for any trading errors made by National Grid have been addressed and although the solution for this is not entirely ideal, on balance we believe that there is merit in implementing the modification proposal.

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

We agree that self-governance is appropriate.

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

As soon as practicable.

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.*

None identified.

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