

## 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](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Gerry Hoggan
<b>Organisation:</b>	ScottishPower Energy Management Ltd
<b>Date of Representation:</b>	6 July 2017
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	c) Positive

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

We agree that the existing methods open to National Grid in respect of the procurement or disposal of Operating Margins Gas are unduly restrictive and as a result do not allow them access to more flexible and potentially cost effective options. For that reason we support the proposal, including the incorporation of the additional rules to address any trading activity errors.

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

We agree with the self-governance statement incorporated within the draft Modification Report

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

Implementation should be as soon as possible allowing for the self-governance appeal timelines

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

None

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

We are satisfied that the legal text will deliver the intent of the solution

**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**

None