

## 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>	Phil Hobbins
<b>Organisation:</b>	National Grid NTS
<b>Date of Representation:</b>	29 <sup>th</sup> June 2017
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	c) Positive, for the reason stated in the report.

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

National Grid NTS, as proposer, supports implementation in order to allow it to access a wider range of Operating Margins gas procurement and disposal mechanisms that will enable it to have greater ability to achieve more competitive prices than may otherwise be possible under current arrangements.

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

As proposer, National Grid NTS supports the self-governance statement as drafted.

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

As self-governance procedures have been agreed, implementation could be sixteen business days after a Panel decision to implement, subject to no appeal being raised.

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

National Grid NTS already trades gas using the proposed additional mechanisms for shrinkage purposes, therefore it would not face any development, analysis or ongoing costs.

### 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**

N/A.