

Representation – Draft Modification Report UNC 0616S

Capacity Conversion Mechanism for Interconnection Points

Responses invited by: **5pm on 12 October 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Graham Jack
Organisation:	British Gas Trading Limited
Date of Representation:	12 October 2017
Support or oppose implementation?	Support
Relevant Objective:	g) Positive

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

Implementation of a capacity conversion mechanism at Interconnection Points (IPs) is a requirement of the amended Capacity Allocation Mechanisms (CAM) network code. This proposal fulfils that requirement and provides a pragmatic and proportionate solution to enable unbundled capacity at IPs to be efficiently bundled. The proposed amendment to the capacity release merit order in subsequent auctions is logical and will, if called on, benefit shippers should surrendered capacity be returned to National Grid following capacity conversion.

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

Self-governance is appropriate for this proposal.

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

The proposal should be implemented to meet the requirements of the CAM network code, i.e. no later than 1 January 2018.

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