

Representation

Draft Modification Report

Modification Report Representation - Draft Modification Report UNC 0625 Extension of 4 months to 10 months to transfer non-mandatory sites from Class 1

1. **Consultation close out date:** 2nd November 2017
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:**
Gazprom Energy
3rd Floor
1 Tony Wilson Place
First Street
Manchester
M15 4FN
4. **Representative:**
Steve Mulinganie
Regulation Manager
stevemulinganie@gazprom-mt.com
0799 097 2568
5. **Date of Representation:** 27th October 2017
6. **Do you support or oppose Implementation:**
We **Support** implementation of Modification 0625
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
The industry expected DM supply points, which have monopoly data services provided by Transporters, to migrate seamlessly into Class 1. Thus providing a 6 month soft landing to transfer those existing DM sites which are not Mandatory Class 1 sites to another class seemed reasonable. However the industry has been beset with a number of Class 1 migration issues which has taken up a considerable amount of industry time and resource to manage. Recognising these issues it seems prudent to extend the existing window by 4 months to recognise these problems.
8. **Are there any new or additional Issues for the Modification Report:**
No

9. Self-Governance Statement Do you agree with the status?

NA

10. Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We **agree** this modification is positive in respect of Relevant Objective (d)

11. Impacts & Costs:

What analysis, development and on-going costs would you face if this modification was implemented?

We **have not** identified any significant costs associated with this modification

12. Implementation:

What lead times would you wish to see prior to this modification being implemented, and why?

To provide market certainty we would propose that an implementation is ASAP.

13. Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

We have **no** comments on the Legal Text provided.

14. Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or you wish to emphasise.

Q1: Respondents are to consider the materiality of the proposed modification and provide evidence (where available) to demonstrate the potential impacts should it be implemented.

It has been noted that the number of sites which will be required to transfer from Class 1 represent circa 13 TWh of energy. Moving this energy from a Mandatory DM Class to another class in an uncontrolled manner risks adding even more energy into UIG in the form of additional NDM energy.

Q2: Following consideration of representations, it is recommended that Panel test the materiality of the modification against the self-governance criteria, prior to making a recommendation/determination on the Final Modification Report.

We believe that circa 13 TWh of energy is material

