

Representation

Draft Modification Report

0333/0333A - Update of the default System Marginal Buy Price and System Marginal Sell Price

Consultation close out date: 11 February 2011

Organisation: TOTAL E&P UK Ltd

Representative: Iain McCombie

Date of Representation: 08 February 2011

Do you support or oppose implementation?

0333: Not in Support

0333A: Support

If either 0333 or 0333A were to be implemented, which would be your preference?

Prefer 0333A

Please summarise (in one paragraph) the key reason(s) for your support/opposition and preference.

We support the introduction of updated default system marginal buy and sell prices (with provision to update annually thereafter) and believe that the cost of this change should, as per the usual User Pays arrangement, be borne by both Transporter and Shipper. National Grid will benefit financially from this update by avoiding a fine likely to be imposed if no update is made and this licence condition remains unfulfilled. On this basis, we oppose Mod 0333 and support Mod 0333A; the latter appropriately shares the cost between Transporter and Shippers.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

No.

Relevant Objectives:

How would implementation of either modification impact the relevant objectives?

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Implementation would mainly facilitate Standard Licence Conditions A11.1 (a) and (c) and to a lesser extent A11.1 (d).

Impacts and Costs:

What analysis, development and ongoing costs would you face if either modification were implemented?

As a Shipper, we would face a share of the one-off cost associated with the xoserve changes. The ROM estimate of £205-227k seems very steep for, as we understand it, creation of a new table within Gemini and creation of a new screen within Gemini.

Implementation:

What lead-time would you wish to see prior to either modification being implemented, and why?

N/A.

Legal Text:

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

NB: while formal legal text has not been provided, Suggested Text has been included in the modifications and comments on this will be helpful when the text is finalised.

Yes.

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

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

No.