

Representation

Draft Modification Report

0363 - Commercial Arrangements for NTS Commingling Facilities

Consultation close out date: 12 September 2011
Respond to: enquiries@gasgovernance.co.uk
Organisation: **E.ON UK**
Representative: Richard Fairholme
Date of Representation: 12 September 2011

Do you support or oppose implementation?

Support

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

We support this proposal on the grounds that it should better facilitate competition by facilitating new (particularly unconventional) sources of gas flowing onto the NTS without, as far as we understand the proposal, imposing undue costs or restrictions on existing NTS connections or potential new entrants. This proposal should, therefore, improve competition in the shipping of gas.

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

No.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We consider that this proposal will help secure competition between Shippers (SSC A11.1(d)), by facilitating the entry of new sources of gas onto the NTS.

Impacts and Costs:

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

Implementation:

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

The proposed implementation dates seem reasonable.

Legal Text:

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

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.