

Representation

Draft Modification Report

0363V - Commercial Arrangements for NTS Commingling Facilities

Consultation close out date: 04 November 2011
Respond to: enquiries@gasgovernance.co.uk
Organisation: Scottish Power
Representative: Gerry Hoggan
Date of Representation: 04 November 2011

Do you support or oppose implementation?

Support/Qualified Support/Neutral/Not in Support/Comments* *delete as appropriate*

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

We believe that this Proposal represents a sensible and pragmatic process that reflects the fairly unique characteristics of such facilities, while at the same time ensuring that the interests of existing, more conventional Users are not prejudiced. However, as with the introduction of any new process we believe it would be prudent to undertake a review after a period of operation to assess the success and effectiveness of the arrangements and to allow for any changes in light of lessons learned.

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 agree that this proposal will better facilitate relevant objectives (c) and (d) being the efficient discharge of NGG's licence obligations and the securing of effective competition respectively.

Impacts and Costs:

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

None

Implementation:

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

We agree with the implementation date proposed.

Legal Text:

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

We are comfortable that the legal text will deliver the intent of the modification. We do have one slight reservation however in that we would query whether the narrow definition of "NTS Commingling Facility" proposed is the best approach to adopt and if it would not have been preferable to have opted for a more wide-ranging, generic definition that concentrates on the unique features involved. This may have future advantages in the event that other facilities with similar characteristics were to be proposed that could then be captured by this definition without the need for any further UNC Modification.

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.