

Representation

Draft Modification Report

0367 - Interruptible to Firm – Supply Point Transition

Consultation close out date: 19 May 2011
Respond to: enquiries@gasgovernance.co.uk
Organisation: National Grid Distribution ("N G D")
Representative: Alan Raper
Date of Representation: 19 May 2011

Do you support or oppose implementation?

Support

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

As part of the implementation of DN interruption reform, with effect from 1st October, all interruptible supply points will convert from interruptible status to firm status, and with effect from that date pay firm transportation charges. In order to ensure that the conversion happens on the correct date, it is proposed that shippers carry out the reconfirmation using existing SPA processes to a predetermined timetable. While this has the effect of allowing the conversion to happen at the right time in a controlled manner, should a shipper not undertake the reconfirmation, the proposal permits Xoserve (on behalf of the relevant transporter), to make the reconfirmation. To ensure that the shipper driven reconfirmation process and the back-stop transporter reconfirmation can exist as sequential activities, it has been necessary to suspend certain SPA process for the affected population for a period of time. Notwithstanding the brief suspension of the SPA activities, we believe the proposal provides for the best solution to facilitate the interruptible to firm conversion process.

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

We have no additional issues to record.

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

We agree with the Panel's decision to progress this proposal as self governance.

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Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

As proposer, NGD believe that implementation of this proposal provides the most efficient process for establishing firm transportation charges for the affected sites. We believe that using tried and trusted SPA process to implement a requirement of DN Interruption Reform (Modification Proposal 0090) provides for the efficient implementation of the UNC. (Relevant Objective (f)).

Impacts and Costs:

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

No further comment over and above that recorded in the modification report.

Implementation:

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

We believe that the proposal should be implemented as soon as possible to provide shippers as much time as possible to prepare for 1st October.

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.