

Representation

Modification Proposal

0373: Governance of NTS Connection Processes

Consultation close out date: 30 March 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: British Gas Trading Limited
Representative: Chris Wright
Date of Representation: 28 March 2012

Do you support or oppose implementation?

Support

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

NTS users have for some time expressed concern at the apparent absence of a robust process to ensure certainty and consistency in the treatment of requests to connect either a supply or a load to the NTS. It seems likely that this resulting uncertainty may have caused potential connecting parties to suffer cost and time overruns on projects. This proposal seeks to deliver much greater certainty around the costs and timings of a connection application, and in doing so will streamline the connection process to the benefit of network users. The formal governance proposed will provide greater certainty over expectations to both potential connecting parties and National Grid;

- Implicit recognition that efficient delivery of the physical connection, or upgrade to an existing connection, is equally important to the obtaining of system capacity;
- With governance comes greater transparency of the process and greater confidence that it will be applied appropriately and in a non-discriminatory manner;
- National Grid will have greater incentives to meet customer requirements in an efficient manner;
- A more transparent and accountable connection process will facilitate competition in supply as the NTS is developed more efficiently when accommodating new gas system entry, exit and storage points;
- The proposal paves the way for the industry to consider a more integrated approach to delivering physical connections and system capacity.

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

There are no new issues we wish to add.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the proposer's view of the relevant objectives which are better facilitated by this proposal, and the extent to which they are better facilitated.

Impacts and Costs:

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

Greater certainty provided by having a defined process covering costs and timings of gaining a connection agreement will greatly enhance the NTS connection experience and will feed into lower overall project costs.

Implementation:

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

We see no reason why implementation should not be in line with the timescales set out in the proposal.

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.

Despite a prolonged gestation, including the discussions with National Grid prior to this becoming a Modification Proposal, we see significant benefits in this proposal and are pleased that it has now progressed to this stage.