

## Representation

### Modification Proposal

#### 0376/A: Increased choice when applying for NTS Exit Capacity

**Consultation close out date:** 06 January 2012  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** British Gas Trading Limited  
**Representative:** Chris Wright  
**Date of Representation:** 06 January 2012

#### Do you support or oppose implementation?

Support both with a strong preference for 0376.

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

Both modification proposals seek to give Users greater flexibility in securing their NTS exit capacity needs. 0376A seeks to provide greater flexibility in respect of the timescales for the application and provision of capacity, while in addition to this 0376 also lowers the ad-hoc threshold trigger from 10 to 1 GWh/day. Our preference is stated on the basis of the additional flexibility provided by this lower volume threshold and, in particular, it being more conducive to facilitating higher gas flows following plant enhancement.

Both proposals will assist exit capacity users in securing and refining their capacity holdings. This will provide economic benefits to users in only having to pay for the exit capacity volumes and periods that they require. We believe this will also offer benefits in respect of optimal network investment decisions.

#### 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?*

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Version 1.0

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SSC A11(d) Securing of effective competition – This additional flexibility for exit capacity users to more accurately match their actual requirements will lead to lower costs and less “waste”. Allowing users to pay for only what they require should result in competitive benefits.

**Impacts and Costs:**

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

Nugatory.

**Implementation:**

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

At the earliest possible opportunity.

**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.