

Representation

Draft Modification Report

0376 and 0376A: Increased Choice when Applying for NTS Exit Capacity

Consultation close out date: 06 January 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: **EDF Trading**

Representative: Mary Palomino

Date of Representation: 06 January 2012

Do you support or oppose implementation?

0376 - Support

0376A - Neutral

If either 0376 or 0376A were to be implemented, which would be your preference?

Prefer 0376

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

As stated in the modification the current ad-hoc window application process restricts the start date and a minimum threshold application is required exposing shippers to unnecessary time constraints and unnecessarily high levels of threshold. Thus EDFT supports the proposal of increasing the level of choice available to users when applying for Enduring annual NTS Exit (flat) capacity which in our view provides a better level of flexibility to shippers by allowing them to book capacity on a more efficient basis. We believe this new proposal will provide greater flexibility and certainty levels for users applying for NTS Exit Capacity minimising the current uncertainty for later start date than the 1 October Y + 4 and allowing users to book the capacity level required by reducing the minimum threshold. We also consider that providing more choices for users reduces user costs and project uncertainty.

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

0376/0376A
Representation

18 November 2011

Version 1.0

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No

Self Governance Statements:

Do you agree with the Modification Panel's decision that these should be self-governance modifications?

Yes

Relevant Objectives:

How would implementation of these modifications impact the relevant objectives?

NA

Impacts and Costs:

What analysis, development and ongoing costs would you face if these modifications were implemented?

NA

Implementation:

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

No need for lead-time

Legal Text:

Are you satisfied that the legal text will deliver the intent of each 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