

Representation

Draft Modification Report

0381 - Removal of the NTS Exit (Flat) Capacity "deemed application" process

Consultation close out date: 12 September 2011
Respond to: enquiries@gasgovernance.co.uk
Organisation: **Corona Energy**
Representative: Richard Street
Date of Representation: 01 September 2011

Do you support or oppose implementation?

Support

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

Corona Energy fully supports the implementation of this proposal. The original justification for the introduction of the deemed application process is not clear and it is inconsistent with the rules which apply for entry capacity overruns. Corona believes that the overrun penalties which will remain in place are sufficiently onerous to deter shippers from under-booking capacity and that the retention of the deemed application process will only drive unwarranted costs and inefficiencies into the market.

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?

Corona concurs with the assertions made in the draft report that the proposal will better facilitate relevant objectives (a) and (d) for the reasons provided.

Impacts and Costs:

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

Reduce risk premium associated with the supply of gas to NTS connected customers.

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Implementation:

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

Prior to 1st October 2012

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