

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: SSE

Representative: Jeff Chandler
Date of Representation: 09 September 2011

Do you support or oppose implementation?

Support/ * *delete as appropriate*

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

The deemed application process is an unnecessary addition to the overrun regime. By creating an automatic application for Enduring NTS Exit (Flat) Capacity this could lead to NTS Exit (Flat) Capacity being allocated to a User at an NTS Exit Point where it is not required and:

- 1) result in a User incurring NTS Exit (Flat) Capacity Charges for up to 4 years for capacity that they have no intention of utilising;
- 2) result in National Grid NTS carrying out system reinforcement / investment in order to provide unnecessary capacity;
- 3) where spare NTS Exit (Flat) Capacity is allocated to a User, such Capacity will be sterilised as it is not required by that User but is not available to others that may have a need for it.

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

NO

Self Governance Statement:

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

Yes

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

SSE believes that the Relevant Objectives will be improved as described in section 4 of the Workgroup Report.

Impacts and Costs:

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

None

Implementation:

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

The mod should be implemented as soon as reasonably practicable to avoid the risk of unnecessary investment being made on the network.

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