

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: Scotia Gas Networks
Representative: Colin Thomson
Date of Representation: 12 September 2011

Do you support or oppose implementation?

Support/Qualified Support/Neutral/Not in Support/Comments* *delete as appropriate*

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

By removing the facility of the 'deemed application' Users will not be allocated additional NTS Exit (Flat) capacity which they do not require. This will lead to the efficient operation of the NTS, preventing reinforcement/investment on the NTS from being carried out when it is not necessary. Users will also be prevented from sterilising capacity that was allocated to them under the existing rules, which could otherwise have been utilised elsewhere. The current NTS Exit (Flat) Overrun charging system should be adequate to incentivise Users to book the appropriate amount of NTS Exit (Flat) capacity.

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

None

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Achievement of relevant objective (a) "Efficient and economic operation of the pipeline system"

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?

This Modification proposal could be implemented prior to the Enduring Exit regime starting in 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