

Representation

Draft Modification Report

0382 - Reducing the capacity element of LDZ system charges for SSPs

Consultation close out date: 12 September 2011

Respond to: enquiries@gasgovernance.co.uk

Organisation: Scottish and Southern Energy

Representative: Mark Jones

Date of Representation: 12 September 2011

Do you support or oppose implementation?

Support

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

The current transportation charging structure profiles charges that are largely not dependent on gas throughput and so the charges do not follow the profile of customer charging. Moving the transportation charges to a 50 / 50 split of capacity and commodity charges would go some way to correcting this imbalance.

As a result of this there can be significant cash flow issues, especially for new entrants.

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?

We agree with the proposer that relevant objectives (a) and (c) will be better facilitated.

Impacts and Costs:

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

None identified.

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Implementation:

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

As soon as possible.

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.