

Representation

Draft Modification Report

0390: Introduction of a Supply Point Offtake Rate Review and Monitoring Process

Consultation close out date: 06 January 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: **National Grid NTS**
Representative: Lesley Ramsey
Date of Representation: 29 December 2011

Do you support or oppose implementation?

Neutral

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

National Grid NTS is neutral in regards to the implementation of this UNC Modification.

National Grid NTS submitted an initial representation on the 16th August 2011 requesting that NTS Exit Points be excluded from this Modification and we note that this has subsequently been done. National Grid NTS also highlighted that an additional change to the UNC Transition Document Part 11.4.6 would also be required and we are also happy to note that the Proposer has agreed to undertake this amendment. National Grid NTS recognises that this Modification may provide a number of benefits for both Distribution Networks and those Shippers with Daily Metered Supply Points within their Distribution Networks, but overall National Grid NTS is neutral regarding implementation of this Modification.

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

National Grid NTS does not believe that there are any new or additional issues to record within the Modification Report.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

0390

Representation

18 November 2011

Version 1.0

Page 1 of 2

© 2011 all rights reserved

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?

Neutral

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

National Grid NTS is satisfied that the legal text delivers the intent of the Modification and that the legal text also excludes NTS Exit Points. However National Grid NTS has identified that an addition to the legal text, in that an amendment to the Transitional Rules, is also required:

UNC Transition Document: Part 11C Transition Rules

11.4.6 TPD Section G: Supply Points

TPD Section G5 (other than TPD Section G5.6 *and G5.7 in their entirety and G5.3.2 (c) G5.3.4 to the extent that it relates to decreases to the maximum offtake rate*) shall apply in respect of an NTS Supply Point Component.

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