

Representation

Draft Modification Report

0393: Interruptible to Firm – NTS Supply Points Transition

Consultation close out date: 03 February 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: National Grid NTS
Representative: Andrew Fox
Date of Representation: 17 January 2012

Do you support or oppose implementation?

Support

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

As a result of UNC modification 0195AV, from 1 October 2012 Interruptible Supply Point Components will no longer exist on the NTS. It is necessary, therefore, that affected NTS Supply Points transition from Interruptible status to Firm.

Although it is the responsibility of Shippers to initiate changes to their Supply Point portfolio, if Shippers were not to initiate the change from Interruptible to Firm status this Modification will enable National Grid NTS to initiate status changes in this specific instance. Hence the Modification ensures that the transition from Interruptible to Firm will be undertaken and completed prior to 1 October 2012.

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

We believe that there are no new or additional issues that should be recorded in the Modification Report

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?

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Version 1.0

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With effect from 1 October 2012, it is a requirement of the UNC that all NTS Exit Points are set up as Firm. This Modification places an obligation on Users to undertake the necessary changes with effect from the relevant date, and provides a fallback allowing National Grid NTS to undertake changes in the event that Users do not. Hence, we believe that it is relevant objective (f) that would be better facilitated by implementation.

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?

Users (and if necessary National Grid NTS) should be given as much time as possible to manage their Supply Point portfolios. Hence implementation should be as soon as possible consistent with UNC, i.e. 16 business days after modification Panel decision to implement.

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, there is not anything further that we wish to be taken into account.