

## 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:** SSE  
**Representative:** Jeff Chandler  
**Date of Representation:** 31 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 Modification 195AV, from 01 October 2012 interruptible supply will no longer exist on the NTS. There is a risk that all the necessary steps may not be taken for all affected NTS Supply Points to transition from Interruptible to Firm status. Users should take the lead in the process to remove NTS Interruptible Supply Points from the relevant Transporter systems. This Proposal creates an obligation on Users to do so. However, where a User does not take the appropriate action, this Proposal establishes the authority for National Grid NTS to take appropriate action on the Users' behalf.

#### 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?*

We consider that implementation of this proposal would better facilitate the efficient administration of the UNC.

#### Impacts and Costs:

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

0393

Representation

31 January 2012

Version 1.0

Page 1 of 2

© 2012 all rights reserved

None

**Implementation:**

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

We agree with the proposers timetable – that this proposal should be implemented in March 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