

## Representation

### Draft Modification Report

#### 0393S: Interruptible to Firm – NTS Supply Points Transition

**Consultation close out date:** 03 February 2012  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** **Scotland & Southern Gas Networks (SGN)**  
**Representative:** Erika Melén  
**Date of Representation:** 25 January 2012

#### 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.

With the implementation of UNC modification 195AV all NTS interruptible supply points will need to become firm from 1<sup>st</sup> October 2012. This modification will create a smooth transition for this by clarifying the process and also enabling National Grid NTS to re-nominate supply points to firm on the shipper's behalf if this has not been carried out in the required timescales. For these reasons we fully support the implementation of this proposal.

#### 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?*

0393

Representation

25 January 2012

Version 1.0

Page 1 of 2

© 2012 all rights reserved

As this modification is clarifying the process and timescales for shipper re-nominations but also enabling National Grid NTS to re-nominate on their behalf should it not be carried out in a timely manner this does better facilitate relevant objective (f)

**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?*

We agree with the proposer that the modification should be implemented as soon as possible or by 1<sup>st</sup> 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