

## Representation

### Draft Modification Report

#### 0396: EU Third Package: Three week switching

**Consultation close out date:** 02 March 2012  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** National Grid NTS  
**Representative:** Andrew Fox  
**Date of Representation:** 27 February 2012

#### Do you support or oppose implementation?

Support

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

The Modification ensures Supply Point registration processes are consistent with the Gas Directive and The Electricity and Gas (Internal Markets) Regulations 2011.

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

We note that the modification has not been proposed as User Pays. However, Ofgem have indicated that User Pays is the appropriate route for funding the system changes required to implement this modification. The proposed ACS puts forward an appropriate methodology for calculation of individual Users' charges. We agree with this User Pays approach.

In the event that it is determined that Transporters, and not Users, shall fund the necessary changes we believe Transporters should provide funding in the same manner as described in the proposed ACS, i.e. in proportion to the Supply Points (excluding Unique Sites) connected to their network. For the avoidance of doubt, this would mean a zero charge for National Grid NTS.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

0396
Representation
27 February 2012
Version 1.0
Page 1 of 2
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This modification was raised to facilitate compliance with the Regulation; hence Relevant Objective g) “compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators” is better facilitated by the Modification.

**Impacts and Costs:**

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

As SPA processes for Supply Points connected to the NTS are managed off-line costs to National Grid NTS (and Xoserve acting on behalf of National Grid NTS) will be low, being limited to administrative changes and (for peak periods) resource scheduling.

**Implementation:**

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

As soon as possible consistent with timelines for necessary systems changes.

**Legal Text:**

*Are you satisfied that the legal text and the proposed ACS (see [www.gasgovernance.co.uk/proposedACS](http://www.gasgovernance.co.uk/proposedACS)) 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

0396
Representation
27 February 2012
Version 1.0
Page 2 of 2
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