

Representation

Modification Proposal

0397S - Amendments to Section I of the OAD to reflect Offtake Profile Notice rules & recognition of different NTS/LDZ Offtake sensitivities

Consultation close out date: 30 March 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: British Gas Trading Limited
Representative: Chris Wright
Date of Representation: 28 March 2012

Do you support or oppose implementation?

Offer comments

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

This proposal appears to extend the range of offtake services available to DN Users. While we agree that some flexibility in operations is appropriate, it is important to ensure that the range of offtake services on offer to DNs does not unduly restrict NG NTS' ability to offer flexible offtake services to directly connected customers. Further, care needs to be taken to ensure that NG NTS is not unduly discriminating in favour of DNs by providing flexible offtake services, for example a "zonal" flexibility product, which are not made available more widely, particularly when such services may be valued by other network Users.

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

Other than the above point which considers whether the proposed treatment of DNs is due or undue discrimination, there are no new issues we wish to add.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Impacts and Costs:

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

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Implementation:

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

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.