

## Representation

### Draft Modification Report

#### **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:** Scotia Gas Networks

**Representative:** Colin Thomson

**Date of Representation:** 30 March 2012

#### **Do you support or oppose implementation?**

Support

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

SGN supports the implementation of this Modification proposal, which will improve the quality of information provided by GDN's to National Grid NTS via OPNs in respect of those offtakes that are most critical to the safe and efficient operation of the NTS, thereby improving the operation of the Total System.

By agreeing the Designated offtakes and associated tolerances on a bilateral basis between NTS and the GDN will ensure a focused and efficient management of these sites by the GDN.

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

None.

#### **Self Governance Statement:**

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

SGN are in agreement with the Modification Panel that this Mod should be self-governance.

#### **Relevant Objectives:**

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

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SGN believe the implementation of the proposal will benefit the relevant objectives by:

b) Coordinated, efficient and economic operation of:

(i) the combined pipe-line system, and/ or

(ii) the pipe-line system of one or more other relevant gas transporters

Where the efficient operation of the upstream and downstream systems can be achieved.

And

f) Promotion of efficiency in the implementation and administration of the Code

Where the use of individual Supplemental Agreements to reflect the specific parameters of Designated Offtakes, therefore allowing the efficient administration of the Section I of the OAD.

### **Impacts and Costs:**

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

SGN anticipates that there will be very little if any costs associated with this Modification.

### **Implementation:**

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

As this Modification is self governance SGN agree with the implementation 16 business days after the panel decision.

### **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?*

SGN are satisfied the legal text provided delivers the content of the Modification.

### **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.*

None.