

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: **Wales & West Utilities**
Representative: Robert Cameron-Higgs
Date of Representation: 29 March 2012

Do you support or oppose implementation?

Support

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

WWU support this proposal as it improves a number of Transporter – Transporter obligations and business processes which mutually benefit both parties, with no detrimental effect for any other UNC code signatory. The one size fits all set of rules which currently apply to all Offtakes and LDZ's are neither necessary nor in some cases achievable. This proposal targets those key designated offtakes where both Transporters need the certainty of operating within a prescribed tolerance (for any change to the relevant Offtake Rate) to ensure Upstream and Downstream changes are anticipated and planned for. By focusing on this handful of designated offtake sites across the Network, all Transporters will gain greater confidence from the offtake change tolerance levels associated with them. There are a number of other small scale changes made to the legal text which confer other changes to the OAD, which reflect working practices and lessen the administrative burden associated with complying with the OAD.

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

None

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20 February 2012

Version 1.0

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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?

b) The proposed changes allow Transporters to prioritise those Offtakes where operating to a required tolerance benefits the efficient operation of the upstream and downstream Transporter. Similarly, the efficiency of the networks is improved by allowing flows to be transferred between Offtakes within the LDZ at the request of either Transporter.

f) Amending OAD Section I to recognise working practices and to support these practices, by referencing to Supplemental Agreements promotes efficiency in the administration of the Code. Using these Agreements allows specific tolerance changes to be made without having to raise a Modification Proposal for every instance.

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?

Standard UNC timeframes. No preparatory work is required for implementation as Transporters have already agreed the Designated Offtakes and tolerance levels.

Legal Text:

Are you satisfied that the legal text [and the proposed ACS (see 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 other comments.