

Representation

Draft Modification Report

0401S: Amendments to the provisions for agreeing pressures at the Offtakes from the National Transmission System to Distribution Networks

Consultation close out date: 30 March 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: **E.ON UK**
Representative: Richard Fairholme
Date of Representation: 28 March 2012

Do you support or oppose implementation?

Comments

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

We are unclear whether the issues raised in the NG NTS initial representation on the potential impact of implementation on other NTS Users (e.g. Direct Connect Power Stations, CSEPs or large industrial customers) have been fully addressed. We would be particularly concerned, for example, if this proposal were to result in a reduced standard of service to, or restrictions on, existing (or future) NTS connections. The DMR does not seem to cover this issue adequately. We are also conscious that this proposal has been developed in the Off-take Workgroup, which many Shippers do not usually attend. We would like to see clarification from both the proposer and confirmation from NG NTS that implementation would not affect other Users and their network access rights, before a Modification Panel determination is made.

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

Yes, as above, a consideration of the impact on non-DN NTS Connected Users is required.

Self Governance Statement:

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

No particular view.

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?

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?

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.