

Representation

Modification Proposal

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: 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.

Whilst we understand, at a very high level, the likely requirement for flexible operation of the NTS and Distribution Systems we wonder whether the extent of the flexibility on offer to DNs from NG NTS is in keeping with NG NTS offering services to all Users on a not unduly discriminatory basis. If "Capacity swapping" occurs or could occur, this may suggest that a form of zonal capacity product is available to DN users but is not available to other NTS Users. Such a product might appear to be akin to short-term capacity transfers between exit points within a defined zone. Arguably, such a secondary market in capacity within a zone might be a useful product for all Users and could help to unlock or make available any capacity that is effectively sterilised due, for example, to a User no longer requiring the capacity but being unable for the time being to release it back to NG NTS (such inability to release capacity might be due to an outstanding User Commitment or the limited opportunity available to apply for capacity reductions).

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?

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Version 1.0

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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?

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.