

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: **National Grid NTS**
Representative: Mark Lyndon
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.

National Grid NTS support the principles of the Modification 401S. By applying the daily agreed pressure process to a reduced list of offtakes, through the creation of a Significant Offtake list, will help facilitate a more efficient process and reduce the admin burden for both Distribution Network Operators (DNO) and National Grid NTS. This modification also provides for a greater focus on the Offtakes that are believed to be the most significant from an operational perspective for both parties and may provide additional clarity in planning the operation of the respective networks.

National Grid NTS provided an initial representation which highlighted some initial concerns with the original draft modification regarding the relief of specific UNC provisions under certain scenarios. The proposer has since amended the modification and the relief of UNC provisions are no longer a feature of the modification. National Grid NTS welcomes the changes made by the proposer and as a result the concerns detailed within our initial representation with regards to this aspect are no longer applicable.

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

National Grid NTS does not believe that there are any new or additional issues to record within the modification report.

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?

National Grid NTS agree with the proposer that this modification better facilitates the relevant objective A11.1 (f) the promotion of efficiency in the implementation and administration of the network code and /or the uniform network code.

Impacts and Costs:

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

There will be a requirement by National Grid NTS and the DNO's to align their processes and internal systems to meet the changes detailed in the modification.

Implementation:

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

National Grid NTS believes a timescale of 16 days after modification panel decision to implement is appropriate.

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 additional comments to add