

## Representation

### Draft Modification Report

#### 0403: EU Third Package: 21 day switching with flexible objection period

**Consultation close out date:** 02 March 2012

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** National Grid NTS

**Representative:** Andrew Fox

**Date of Representation:** 27 February 2012

#### Do you support or oppose implementation?

Support

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

The modification ensures Supply Point registration processes are consistent with the Gas Directive and The Electricity and Gas (Internal Markets) Regulations 2011.

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

The draft modification reports states that the modification is "intended to be an interim measure until the Gas Change of Supplier processes can be reviewed more fully", but there is no sunset clause. Hence if/when considering implementation the modification should be viewed as a permanent change.

#### Relevant Objectives:

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

This modification ensures compliance with the Regulation; hence Relevant Objective g) "compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators" is better facilitated by the modification.

#### Impacts and Costs:

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

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As the modification only proposes changes to the Objection period, and these changes only apply on limited occasions, the impact on National Grid NTS (and Xoserve acting on behalf of National Grid NTS) will be minimal.

We agree with the classification of the modification as User Pays, but would note that, in this case, User refers to Shipper Users and not to DNO Users.

**Implementation:**

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

As soon as practicable.

**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?*

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