

Representation

Modification Report

0407: Standardisation of notice periods for offtake rate changes for all National Grid NTS Exit Users

Consultation close out date: 06 September 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: Wales & West Utilities Ltd
Representative: Steve Edwards
Date of Representation: 06 September 2013

Do you support or oppose implementation?

Support

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

Implementation of 0407 will promote efficiency by removing unnecessary investment in the DN Networks to enable them to always be able to comply with the 2 hour 5% rule.

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

None

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

The current rule has a significant impact on current operation in our Network as well as the terms we would be able to offer new customers and their cost of connection. This is due to the balance of domestic and non-domestic load particularly at low demand levels. These revisions will allow us to look at more innovative solutions to deal with the issue on the occasions it becomes necessary.

The modification has a positive impact on the efficient discharge of our obligations in removing the unnecessary investment detailed above.

Modification 0407 promotes effective competition between gas shippers on the Total System by removing additional constraints on shippers shipping on distribution systems.

Additionally it improves efficiency in the implementation and administration of the code by codifying existing practices and amending the application of a UNC rule which we cannot readily comply with.

0407
Representation

18 July 2013

Version 1.0

Page 1 of 2

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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?

We would welcome implementation as soon as is practicable for other parties as it will immediately improve the situation for our operations and our compliance performance.

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.

We welcome the transparency offered by this UNC Mod in communicating that the rule is on via industry communications. This transparency will support operational discussions between ourselves and our customers in the event that flexibility is constrained.