

Representation

Draft Modification Report

0409S: Removing the restriction on the Users' application quantity for Annual NTS Exit (Flat) Capacity

Consultation close out date: 05 April 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: **National Grid NTS**
Representative: Sarah Lloyd
Date of Representation: 05 April 2012

Do you support or oppose implementation?

Support

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

As proposer, National Grid NTS believe that the change proposed in Modification 0409S is necessary to remove a provision in the code which may unnecessarily prevent Users from applying for Additional Annual NTS Exit (Flat) Capacity that could be released at National Grid NTS' discretion. Implementation of this modification would clarify the operation of the UNC and ensure the intention of Modification 0290 is not undermined.

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

There are no additional issues that we believe should be recorded.

Self Governance Statement:

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

National Grid NTS agrees that Modification 0409S meets the self governance criteria.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

National Grid NTS anticipates that the implementation of Modification 0409S would better facilitate the achievement of relevant objective (f) since it clarifies the UNC to fully reflect the intention of Modification 0290 by removing an obligation which has previously been disregarded in practice; thereby promoting efficiency in the implementation and administration of the code.

Impacts and Costs:

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

No analysis, development or ongoing costs have been identified by National Grid NTS to facilitate the implementation of Modification 0409S.

Implementation:

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

Since this modification is specific to the Annual Application Window, implementation prior to 01 July 2012 would be desirable.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

National Grid NTS are satisfied that the legal text delivers 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.

There are no further aspects that we wish to be taken into account.