

Representation

Draft Modification Report

0411S: Removal of the Obligation to Publish Firm Gas Monitor from the UNC

Consultation close out date: 01 June 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: E.ON UK
Representative: Richard Fairholme
Date of Representation: 31 May 2012

Do you support or oppose implementation?

Support.

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

We consider that National Grid NTS continuing to calculate and publish a figure which has, by reason by reason of industry change, become largely irrelevant to industry participants and which could be potentially misleading to industry observers is not consistent with efficient operation of the market. We do not believe industry participants make use of this figure and support the removal of the Code obligations underpinning it.

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

No.

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?

We agree with the proposer's assessment.

Impacts and Costs:

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

We are able to confirm that there would be no impacts or costs on us, as a Shipper, if this Modification Proposal is implemented.

Implementation:

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

As soon as reasonably practicable.

Legal Text:

Are you satisfied that the legal text [and the proposed ACS (see 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.