

## 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:** National Grid NTS  
**Representative:** Malcolm Arthur  
**Date of Representation:** 30 May 2012

#### Do you support or oppose implementation?

Support

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

To ensure the market works effectively and efficiently, we believe that accurate and relevant information is required. With the change in designation of demand to firm under modifications 090 and 195AV, we believe that there is limited value in continuing to publish the Firm Gas Monitor as this information is no longer relevant. In addition, there is potential for confusion and concern if a Firm Monitor breach is published but no market response is required or expected.

#### 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?*

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The reduction in internal resources used to develop the Firm Monitor and the removal of potentially confusing market information will better facilitate relevant objectives c) and d).

**Impacts and Costs:**

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

No analysis or development costs are required to implement this modification. The implementation of the modification would reduce the ongoing costs due to the reduction in resource required to develop and publish the Firm Monitor information.

**Implementation:**

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

There is no lead time required to implement the modification. [we said 10 business days in the mod.]

**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. National Grid NTS welcomes any comments submitted with regards to the suggested text.

**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