

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: Scottish Power
Representative: Gerry Hoggan
Date of Representation: 28 May 2012

Do you support or oppose implementation?

Support

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

We agree with the proposal in that need for the Firm Gas Monitor has been overtaken by changes in the interruptible regime such that its publication is now largely irrelevant. Indeed its continuance may now only lead to confusion and unnecessarily alarming signals as it is most likely to be breached, and to remain breached, without that actually representing any change in supply or reduction in the level of security of supply.

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 that removing an obligation that is now largely irrelevant and may actually be detrimental should better promote efficiency in the implementation and administration of the UNC as required by Relevant Objective (f) of the Code.

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?

As this is a Self-Governance Modification, we would agree that implementation should be 16 business days after a Modification Panel decision to implement.

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.