

Representation

Draft Modification Report

0413S: DN Adjustment of notices for the reduction of Enduring Annual NTS Exit (Flat) Capacity

Consultation close out date: 08 May 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: National Grid NTS
Representative: Dennis Rachwal
Date of Representation: 08 May 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 0413S is needed to remove a provision in the code which may unnecessarily restrict DNO Users from reasonably adjusting Enduring Annual NTS Exit (Flat) Capacity reduction requests for Gas Years Y+1, Y+2 and/or Y+3. Implementation of this modification may enable DNO Users opportunity for more economic operation and may enable National Grid NTS to make better informed operational planning and investment decisions and reduce the risk of some sterilised NTS Exit Capacity.

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 0413S meets the self governance criteria.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

0413S
Representation

08 May 2012

Version 1.0

Page 1 of 2

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National Grid NTS anticipates that the implementation of Modification 0413S would better facilitate the achievement of relevant objective (c) since it may enable more efficient discharge of National Grid NTS obligations to plan and operate the NTS and more efficient discharge of Distribution Networks obligations to economically operate Distribution Networks.

Impacts and Costs:

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

For National Grid NTS some minor changes may be necessary resulting from assessment of and subsequent operations arising from less restriction in Enduring Annual NTS Exit (Flat) Capacity allocation.

Implementation:

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

We would like implementation to be effective before 1st July 2012 so that the provisions were in place in time for the next Annual Application Window for NTS Exit Capacity Applications and Notices of Reduction.

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?

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.