

Representation

Draft Modification Report

0414S: Discontinuation of ANS usage for Interruption Communications by Transporters

Consultation close out date: 11 June 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: **Scotland & Southern Gas Networks**

Representative: Erika Melén

Date of Representation: 08 June 2012

Do you support or oppose implementation?

Support

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

SGN raised this modification to remove a redundant section out of the UNC in relation to the use of ANS for interruption batch communications. By doing so, DNOs will no longer be obliged to make use of this system for sending communications resulting in a financial saving to the networks which can be allocated to ensuring other, more modern, systems are in place.

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?

0414S

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Version 1.0

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Maintaining access to ANS is imposing an unnecessary cost on DNOs and so by removing the redundant system (for DNO purposes) it is felt that this will better facilitate **Relevant Objective c)** efficient discharge of the licensee's obligations.

UNC TPD Section G6.9 is now redundant as batch transfer is no longer in use for interruption notifications hence not requiring the related ANS communication. This modification can be seen to promote the efficient administration of the Code as per **Relevant Objective f)** by removing this redundant section.

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?

16 days following a Panel decision

Legal Text:

Are you satisfied that the legal text 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