

## Representation

### Draft Modification Report

#### 0415: Revision of the Gas Balancing Alert Arrangements

**Consultation close out date:** 07 September 2012

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** ExxonMobil Gas Marketing Europe Ltd

**Representative:** Pierluigi Frison

**Date of Representation:** 7<sup>th</sup> September 2012

#### Do you support or oppose implementation?

Support

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

We support the Modification on the grounds of improved market awareness, transparency and relevance. We believe more flexible triggers will allow National Grid NTS to produce a more pertinent and responsive alert compared to the existing, mechanical, system. Refining the terminology and increasing communications relating to the events will further allow shippers to better understand the needs of the system and respond in a market-effective manner consistent with our shared principles.

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

In providing National Grid with greater flexibility to determine the triggers it is important that they exercise that responsibility with due care and attention. ExxonMobil Gas Marketing Europe Ltd would like to see National Grid provide more detail how it intends to conduct its operations in order to be able to demonstrate to shippers that it is at all times acting prudently and responsibly.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

We agree with the Workgroup assessment, describing Mod 415 as improving the operations of the system in a more coordinated, efficient and economic way, and being therefore consistent with these key relevant objectives. ExxonMobil Gas Marketing Europe Ltd also supports this Mod as a positive move in complying with relevant European regulations.

**Impacts and Costs:**

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

Negligible costs in terms of revised Operational procedures.

**Implementation:**

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

The Modification should be implemented before the start of Winter and 1<sup>st</sup> of October 2012 seems to be a sensible date due to the expected ease of managing the change.

**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

**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.*