

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: National Grid
Representative: Claire Thorneywork
Date of Representation: 07 September 2012

Do you support or oppose implementation?

Support

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

National Grid believes that this Modification Proposal, if implemented, will provide an improved signal, to the industry, of instances where a near term requirement to redress a forecast system imbalance position is required. National Grid NTS believes that if implemented the improvement and clarity of the signal will go some way to mitigate the risk of a supply/demand deficit escalating into a Gas Deficit Emergency.

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

We are not aware of any additional issues.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

The proposed revisions to the GBA signal will provide greater clarity in respect of the status of the system during times of significant system supply/demand imbalance. In response to such information Users may confidently initiate appropriate steps to assist in mitigating system issues. National Grid NTS believes that as a result of Users responding through primary balancing activities, costs associated with the System Operator taking balancing actions may be reduced. We therefore consider that the Proposal, if implemented, will facilitate improvements in the economic and efficient operation of the combined Gas Pipe-line System. In addition, the proposal will increase compliance with the current European legislation.

Impacts and Costs:

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

Analysis, development and ongoing cost are provided within the Proposal

Implementation:

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

Details regarding lead-times are provided within the Proposal

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