

Representation

Draft Modification Report

0417S: Notice for Enduring Exit Capacity Reduction Applications

Consultation close out date: 11 June 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: Centrica Storage Limited
Representative: Antony Miller
Date of Representation: 8 June 2012

Do you support or oppose implementation?

Support.

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

Centrica Storage Limited (CSL) supports this modification on the basis that it reduces the potential for shippers to be exposed to unexpected costs associated with enduring exit capacity which can greatly exceed their relevant User Commitment Amounts. CSL is of the view that this modification will enhance the efficient and economic operation of the pipe-line system by improving the signalling of exit capacity requirements. This should also improve NGG's ability to efficiently discharge its licence obligations in relation to developing the system.

This modification will also help secure efficient competition by aligning costs to relevant system users, and removing incentives for users to hold incremental rather than enduring capacity.

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?

CSL's views are set out in the modification report.

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?

This modification should have immediate effect to ensure that National Grid Gas can assess applications made in the July application window.

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.