

## Representation

### Draft Modification Report

#### 0420: New Connections Interruptible loads

**Consultation close out date:** 07 September 2012  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** National Grid Transmission  
**Representative:** Ritchard Hewitt  
**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/opposition.

Within the Proposal part 13 of the temporary interruptible process indicates "*this modification excludes connections made onto the NTS and is not aimed at emergency interruption resulting from supply or system constraints on the NTS*". Although we note that NTS Supply Points are out of scope of the proposal we have spoken to the proposer in order to understand how these Temporary Interruptible Supply Points will be treated with regards to a Network Gas Supply (Gas Deficit) Emergency (GDE). Scotia Gas Networks have confirmed that no changes have been proposed to Section Q of the UNC and that these Temporary Interruptible Supply Points would therefore be treated no differently to other Interruptible Supply Points and therefore included in stage 1 of a GDE should such a situation occur. We welcome this clarification and on this basis offer support to this modification, as we agree that having a temporary interruptible supply will remove barriers and delays that may otherwise prevent new supplies being connected.

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

No

#### Relevant Objectives:

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

We agree with the proposer that having a temporary interruptible supply will remove barriers and delays that may otherwise prevent new supplies being connected and therefore this modification better facilitates Relevant Objectives b. Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.

**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?*

**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?*

**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.*

None.