

Representation

Draft Modification Report

0420: New Connections Interruptible loads

Consultation close out date: 07 September 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: WWU
Representative: Robert Cameron-Higgs
Date of Representation: 07 September 2012

Do you support or oppose implementation?

Qualified Support

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

This proposal allows new (large) sites to connect to the Gas Distribution Network using a temporary (zero cost) interruptible contact, in the lead time until its connection is firm. This measure promotes a better use of any spare capacity until such time as any necessary reinforcement is complete to satisfy peak demand on the Network. This 'earlier' connection will also assist those shippers/suppliers/end customers by facilitating an earlier connection than would otherwise be the case.

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?

Proposal 0420 satisfies the relevant objective (a) & (b) by promoting efficient and economic of the pipeline system.

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?

The modification can be implemented without delay following any direction from Ofgem

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.

We are supportive of the proposal and its intent, which will assist those new sites (which are potentially subject to Specific Reinforcement costs) to connect to the Gas Distribution Network on a temporary interruptible basis. Concerns have been raised as to the treatment of existing customers in a 'like' situation which the proposal does not address.

The proposal does however stand alone and in WWU's view, satisfies the relevant objectives by which its implementation should be decided.