

## Representation

### Draft Modification Report

#### **0423S: Removing the UNC TPD Section O requirement to publish nodal forecast data only at the same time as the Ten Year Statement**

**Consultation close out date:** 10 July 2012

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

**Organisation:** **National Grid NTS**

**Representative:** Richard Hounslea

**Date of Representation:** 10 July 2012

#### **Do you support or oppose implementation?**

Support

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

Removing the requirement to publish nodal forecast data only at the same time as the Ten Year Statement would allow National Grid NTS to publish the data used in charge setting activities which are more frequent and at different dates to the publication of the Ten Year Statement.

Allowing publication at more frequent times, alongside charge setting processes would provide greater transparency of charge setting to the market and provide data to the market in a timelier manner.

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

We do not believe there are any new or additional issues to record within the Modification Report.

#### **Self Governance Statement:**

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

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The proposer agrees with the Modification Panel's decision that this modification should be classed as self-governance as its implementation would not discriminate between different classes of UNC parties, or have a material effect on existing or future gas customers, competition (other than its promotion), operation of the pipeline system(s), matters relating to sustainable development, safety or security of supply, or the management of the market or network emergencies.

The modification was raised in order to improve the transparency and clarity of the charge setting process, and to present information to the market in a timely fashion.

### **Relevant Objectives:**

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

**Better facilitates Relevant Objective (d) Securing of effective competition (i) between relevant shippers, and/or (ii) between relevant suppliers, and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.**

Implementation of this modification would enable Users to access the most up-to-date forecast demand data by enabling National Grid NTS to publish the data as and when capacity prices are updated.

Aligning the publication of data with the charge setting processes would allow Users to replicate the charge setting process in a timelier manner, and would provide improved transparency of data used in the setting of charges.

### **Impacts and Costs:**

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

National Grid NTS has identified that no further analysis, development or ongoing costs will be incurred as a result of implementing this modification, with only minor changes to NTS manual processes being necessary. This is not a User Pays modification.

### **Implementation:**

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

Without prejudice to any decision by the Modification Panel on whether or not to implement this modification, National Grid NTS believes this modification can, and should, be implemented 16 business days after a decision to implement.

### **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?*

National Grid NTS is satisfied that the legal text 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.*

National Grid NTS does not believe there is anything further to be taken into account.