

Representation

Draft Modification Report

0439: Notice for Enduring Annual Exit (Flat) Capacity Reduction Applications

Consultation close out date: 15 April 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: Total Gas & Power Limited
Representative: David Faragher – Head of Legal & Regulation
Date of Representation: 15 April 2013

Do you support or oppose implementation?

Support/Qualified Support/Neutral/Not in Support/Comments* *delete as appropriate*

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

The proposal would allow Users who have Enduring Annual NTS Exit (Flat) Capacity to run their businesses more efficiently, in that they would not be obliged to hold (and therefore pay for) the capacity for longer than they require it for, which they are currently obliged to do because of the current requirement for 14 months' notice". This would also be fairer as such Users would then be treated in the same way as those Users who are not currently subject to a 14 months' notice period.

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?

Implementation would better facilitate the achievement of relevant objective d: securing effective competition. The main impacts are firstly, that it removes any discrimination between those Users able to reduce capacity holdings in a reduced timescale following settlement of a Commitment Amount and all other Users; and secondly, it will facilitate investment in additional offtake infrastructure, which in turn will underpin market development and competition.

Impacts and Costs:

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

Negligible

Implementation:

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Version 1.0

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

We would support the implementation of this modification prior to the next capacity application window in July 2013.

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?

We are satisfied with the legal text.

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.