

Representation

Draft Modification Report

0449: Introduction of Interconnection Points and new processes and transparency requirements to facilitate compliance with the EU Congestion Management Procedures

Consultation close out date: 08 August 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: Gazprom Marketing & Trading (GM&T)
Representative: Ric Lea
Date of Representation: 08 August 2013

Do you support or oppose implementation?

Support

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

This modification is necessary for compliance with the CMP network code. GM&T has not identified any issues which would hinder the relevant objectives as a result of implementation into the UNC.

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

GM&T would like to highlight that in modifications following this, the definition of an Interconnection Point (IP) should be uniform across implementation of all EU network codes in the GB system, in particular when considering the interaction between CMP and bundling of cross-border capacity via the Capacity Allocation Mechanisms Network Code (CAM)

Also note that this modification and CMP has the purpose of addressing contractual congestion, rather than physical congestion within the pipeline.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

As per modification report – GM&T agrees that this modification will have a positive impact on relevant objectives D and G.

Implementation:

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

By 1st October 2013, in line with obligations under the CMP network code

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

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18 July 2013

Version 1.0

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Legal text not reviewed

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.