

## Representation - Draft Modification Report 0519

### Harmonisation of Reference Conditions at Interconnection Points

Responses invited by: **24 April 2015**

<b>Representative:</b>	Graham Jack
<b>Organisation:</b>	British Gas Trading Limited
<b>Date of Representation:</b>	24 April 2015
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<b>g)</b> Positive

**Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)**

We consider the proposal to be a pragmatic solution to the reference conditions changes that are required at Interconnection Points on account of the EU Interoperability Code.

**Implementation:** *What lead-time do you wish to see prior to implementation and why?*

Implementation should be in sufficient time to comply with EU code requirements. We note that the modification report suggests that implementation should be by no later than 1 May 2016. If the lead time for implementation is to be long it would be helpful for National Grid to provide a timely reminder when the implementation date approaches.

**Impacts and Costs:** *What analysis, development and ongoing costs would you face?*

Costs are expected to be low.

**Legal Text:** *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes.

**Modification Panel Members have requested that the following questions are addressed:**

**Q1:** *Please provide your views on the self-governance status.*

Implementation of the proposal will have commercial and operational consequences. Since the proposed solution is not a simple, direct lift from the EU Interoperability Code there will be merit in having pro-active consideration by the Authority.

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

None identified

**Please provide below any additional analysis or information to support your representation**

No further comments.