

Representation – Urgent Workgroup Report 0560

Addressing under-allocation of flows from BBL arising from misalignment of reference conditions

Responses invited by: **17 November 2015**

To: enquiries@gasgovernance.co.uk

Representative:	Charles Ruffell
Organisation:	RWE Supply & Trading GmbH
Date of Representation:	16 th November 2015
Support or oppose implementation?	Support
Relevant Objective:	d) Positive g) Positive

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

The NTS and BBL have chosen different dates to comply with the requirements of the Interoperability Code for harmonisation of reference temperature conditions at Interconnection Points. This misalignment of reference conditions between the two TSOs is outside the control of the affected Users. Without this modification and until the enduring solution (0519) is implemented, BBL users will face an underallocation on the NTS and be exposed to additional costs. By adjusting the energy balancing invoice each month as set out in the proposal, affected Users will avoid inappropriate costs.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

We agree that this is not a self-governance modification.

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

The Ofgem Urgency Decision letter shows an Ofgem decision by 4th December. Implementation should be immediately after this decision to minimise the period of retrospective application.

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

None identified.

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

Yes.

Additional Workgroup Question for this Consultation:

Are any of the Ofgem conditions for retrospectivity satisfied? (see the Appendix in the Workgroup Report for details)

In our view it meets two of the conditions:

- a situation where the fault or error giving rise to additional costs or losses was directly attributable to central arrangements; and
- where the possibility of a retrospective action had been clearly flagged to the participants in advance, allowing the detail and process of the change to be finalised with retrospective effect.

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