

Representation - Draft Modification Report UNC 0597 Rules for the release of incremental capacity at Interconnection Points

Responses invited by: **5pm on 09 February 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Graham Jack
Organisation:	British Gas Trading Limited
Date of Representation:	8 th February 2017
Support or oppose implementation?	Support
Relevant Objective:	g) Positive

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

The modification proposal is necessary to ensure that the requirements of the amended CAM network code, related to the provision of incremental capacity, are implemented on time. We agree with the proposer that a PARCA approach for the delivery of incremental capacity at Interconnection Points is superior to allocation via auctions. We note that some important, related issues remain to be discussed and clarified: how the economic test will work; the quantity of capacity to be withheld for short-term auctions; and the exact form of charging for incremental capacity (i.e. fixed versus floating). However, National Grid have given assurances that these issues will be attended to and debated in good time and we are therefore satisfied that the modification proposal should be implemented.

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

We agree that this proposal should be carefully considered by the Authority and that self-governance is not advisable.

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

In sufficient time to meet the requirements of the amended CAM network code.

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.

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