

Joint Office

enquiries@gasgovernance.co.uk

9th December 2020

Dear Sir or Madam,

Re: UNC Modification Proposal 0736S - Clarificatory change to the AQ amendment process within TPD G2.3

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

NGN supports this Modification Proposal.

Reason for support/opposition:

We support this modification proposal as it seeks to provide addition clarity around the circumstance under which G2.3.21(c) can be utilised. We believe the reason code was originally intended to allow a User to make AQ adjustments where they have taken over an individual supply point and they believe that the AQ is an incorrect reflection of the expected gas usage. This modification proposal seeks to ensure that this reason code can only be utilised where a Supply Point moves from an User that is not part of same or common ownership. This should prevent the reason code from being used to move portfolios between associated Users to correct mass AQ inaccuracies. We therefore believe that this is positive for Relevant Objective d) *Securing of effective competition: (i) between relevant Shippers, (ii) between relevant suppliers*, as it should limit the activity from being used to make mass AQ changes, therefore reducing the volume of resulting charges being socialised across other industry parties.

Implementation:

This proposal could be implemented 16 business days after Panel approval, subject to no appeal being raised.

Impacts and Costs:

We have not identified any impacts or costs associated with this change.

Legal Text:

We believe the legal text provided should deliver the Solution set out in the modification.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

None identified.

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

None.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Tracey Saunders (via email)
Market Services Manager (Industry Codes)
Mobile: 07580 215 743

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