

Representation – Modification UNC 0700 (Urgent)

Enabling large scale utilisation of Class 3

Responses invited by: **5pm on 07 August 2019**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Claire Roberts
Organisation:	ScottishPower
Date of Representation:	07 August 2019
Support or oppose implementation?	Qualified Support
Relevant Objective:	f) Positive

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

ScottishPower supports the modification as it seeks to address the capacity constraint that the CDSP has at present. Our support is qualified as we have concerns on how the management of capacity will be allocated and managed by the CDSP and when the capacity issue is to be end dated. The modification as it is would change the definition of Product Class 3 for EUC01.

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

The modification should be implemented as soon as possible (Ofgem Direction of the Urgent MOD).

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

N/A

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 that you think should be taken into account? Include details of any impacts/costs to your organisation that are directly related to this.

N/A

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

Business Rule 5 – States Shippers shall in good faith, provide indicative volumes of transfer to product class 3 and the CDSP shall monitor the requested volumes against capacity of class change and where the CDSP determines this will impact the ability to process the indicative volumes. The capacity for Shippers will be determined by the CDSP, it needs to be stipulated how the capacity would be shared out & if there was capacity not being used would other Shippers be allowed to have extra capacity on a given 7 day period.

There is no end date given on when the CDSP expect to resolve the capacity issue & the use of all readings provided being used for downstream processing. Clarification needs to be provided whether this is a temporary or enduring solution.