

Representation - Draft Modification Report UNC 0698S

Improvements to Margins Notice Arrangements

Responses invited by: 5pm on 08 August 2019

To: enquiries@gasgovernance.co.uk

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

Representative:	Graham Jack
Organisation:	Centrica
Date of Representation:	8 August 2019
Support or oppose implementation?	Support
Relevant Objective:	<p>a) Positive</p> <p>b) Positive</p> <p>c) Positive</p>

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

The Modification is the result of months of industry assessment (via Review Group 0669R) of the Margins Notice (MN) mechanism and of various options for improving it. If implemented, it will provide a significant improvement over the current method with a more dynamic and transparent assessment of the day-ahead forecast supply/ demand situation. The introduction of a proportionate “early warning” notification will also help to alert industry to a high likelihood of an MN being issued and will provide an added impetus for corrective measures to be taken earlier than would otherwise have been the case. Positive impacts on 3 of the relevant objectives, as detailed in the workgroup report, are credible and supported.

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

Self-governance is appropriate and aligns with the identified benefits when measured against the 3 relevant objectives highlighted as “positive” in the workgroup report.

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

As soon as reasonably practicable.

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?*

No issues identified.

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