Representation - Draft Modification Report UNC 0696

Addressing inequities between Capacity booking under the UNC and arrangements set out in relevant NExAs

Responses invited by: 5pm on 12 September 2019

To: enquiries@gasgovernance.co.uk

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

Representative:	Andrew Green
Organisation:	Total Gas & Power Ltd
Date of Representation:	12th September
Support or oppose implementation?	Support
Relevant Objective:	**f)** Positive

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

We believe that arrangements between Consumers and Transporters under a NEXA should aligned with the UNC which is a code operating between Shippers and Transporters. Consumers would therefore not be charged where capacity is not available under the NEXA. This would be a simple cross check and therefore I believe relatively easy to implement. Given the significant consumer detriment in this case we believe limited retrospection is justified as the case made meets the tests that Ofgem apply regarding the granting or retrospection. We believe that Transporters acknowledge the issue, with NGN having raised Mod 0701.

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

As soon as possible as it should be relatively easy to implement

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

The impact is beneficial as it would remove the risk of capacity being booked when it is not permitted to be utilised. There would be no costs.

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

We have not carried out a legal review of the text

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.*

No

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

None