

Cadent Gas Limited
Brick Kiln Street, Hinckley
Leicestershire LE10 0NA
cadentgas.com

Bob Fletcher
Joint Office of Gas Transporters
Radcliffe House,
Blenheim Court,
Warwick Road,
Solihull
B91 2AA

Andy Clasper
Andy.clasper@cadentgas.com
Direct tel +44 (0)7884 113385

30th November 2020
Your Reference: UNC Modification Proposal 0736S

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

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal which Cadent supports.

Do you support or oppose implementation?

Support

Relevant Objective:

d) Positive

Reason for support/opposition:

The modification, if implemented, would clarify the circumstances in which Shippers could utilise the AQ amendment process as per TPD G2.3.21(c), more commonly referred to as 'reason code 3'.

The AQ amendment arrangements were put in place following Project Nexus and were outlined within the Annual Quantity Project Nexus Business Requirement Document (BRD). In our view the AQ amendment process was only ever intended to be an exceptions process following the switch of a Supply Point from one Shipper to another (unrelated) Shipper. Unfortunately, the arrangements outlined within the UNC do not fully match the intent of the BRD and currently allows for circumstances in which a Shipper could amend large numbers of AQs 'en masse' by moving them from one 'short code' to another.

This modification would therefore amend UNC to match the intent of the BRD by ensuring 'reason code 3' remains an AQ amendment exceptions process following a switch of Supply Point from one Shipper to another unrelated Shipper.

By removing the ability for 'reason code 3' to be used inappropriately, with the consequential socialising of avoided transportation charges to all Shippers, this modification would further Relevant Objective d) Securing of effective competition.

Implementation

As this is simply a clarificatory modification which requires no Xoserve system changes, implementation could be 16 days following approval by Panel subject to no appeal being raised.

Impacts and Costs

We do not envisage any costs associated with this change.

Legal Text

As proposer we are satisfied that the legal text meets the intent of the modification.

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

We have not identified any errors or omissions.

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

Nothing further to add.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 07884 113385 (andy.clasper@cadentgas.com) should you require any further information.

Yours sincerely,

Andy Clasper