

Representation

Draft Modification Report

0473 0473A – Project Nexus – Allocation of Unidentified Gas

Consultation close out date: 13 November 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: Gas Plus
Representative: Naomi Nathanael
Date of Representation: 12 November 2014

Do you support or oppose implementation?

0473 – Oppose

0473A – Support

If either 0473 or 0473A were to be implemented, which would be your preference?

0473A

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

We strongly **oppose** implementation of mod 0473 with its intent to exclude Class 2 sites being allocated any UG cost. This mod opens a gateway for suppliers to opt out of UG allocation through a 'safe haven', resulting in the disproportioning and redirecting of UG costs to SSPs that are not able to provide reads daily. **Mod 0473a** proposes a more appropriate and accurate allocation of costs between Shippers and Suppliers as well as secures effective competition between Users.

Modification Panel Members have indicated that it would be particularly helpful if the following questions could be addressed in responses:

Q1: Please provide as much information and analysis to support your response, particularly any justification for why any particular class should, or should not, attract unidentified gas costs.

Unidentified Gas is an industry wide issue affecting all Classes. Not allocating UG to any certain Class grossly distorts competition and creates inaccuracies in the allocation of UG costs between Users.

Q2: We welcome views on the attribution of unidentified gas costs under these modifications to NTS direct-connected sites.

0473 0473A
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Version 1.0

Page 1 of 2

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Are there any new or additional issues that you believe should be recorded in the Modification Report?

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

The implementation of 0473 is a direct contradiction of its objective to facilitate effective competition between Users, as the changes do not lead to any form of accuracy in the allocation of UG between suppliers. It specifically has dire impacts on SSPs.

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

Legal Text:

Are you satisfied that the legal text and the proposed ACS (see www.gasgovernance.co.uk/proposedACS) will deliver the intent of the modification?

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.