

Representation

Draft Modification Report

0461 - Changing the UNC Gas Day to Align with the Gas Day in EU Network Codes

Consultation close out date: 27 January 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: SSE
Representative: Jeff Chandler
Date of Representation: 23 January 2014

Do you support or oppose implementation?

Support

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

SSE are supportive of the Third Package and liberalisation of the EU energy markets. We are therefore supportive of the European CAM network code to align the gas day across Europe to 05:00 to facilitate trade and free flow of gas. From a UK perspective, however, cost will be incurred in changing systems and operational practices with little apparent benefit because gas is already successfully traded and shipped across the interconnectors.

In-addition, there is still uncertainty over the solution and the level of costs to ensure that the upstream production industry can function with the change of the gas day to 05:00. Although outwith the scope of the UNC this is an important issue in terms of cost to producers and ultimately customers.

We do not anticipate any material issues with interactions with the power market resulting from this change.

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

Q1: Please provide views on the time constraints of the process and effort required to implement this modification.

It is important that this modification is determined on as soon as possible so as to maximise the time available to implement the necessary system changes, both for the industry and individual companies.

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

No

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Version 1.0

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Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

SSE agree with the views of the proposer.

Impacts and Costs:

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

Costs will be incurred because of system and operational changes, these have yet to be quantified.

Implementation:

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

SSE agree with the timings in the modification.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

Yes.

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.

No.