

## 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:** E.ON UK  
**Representative:** Richard Fairholme  
**Date of Representation:** 24 January 2014

#### Do you support or oppose implementation?

Support

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

Given the obligation on National Grid to comply with the European CAM Network Code, we believe this proposal represents a pragmatic solution to the issue of changing the Gas Day in the UK from 0600 hours to 0500 hours. The Mod has been extensively developed through the workgroup process and is now in a position to be implemented. We note, however, that wider industry debate on the merits of a Gas Day change in the UK is continuing and that many parties consider the change unnecessary and potentially damaging. In the absence of any advice to the contrary, our working assumption remains that this change will happen in the UK and that as a prudent Shipper we must plan for it accordingly. This Mod will have significant system and process impacts for us and therefore the earlier that this Mod can be approved (or rejected) and implementation timescales set out, the sooner we can get started on making the necessary internal changes.

#### 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.

See above. We believe it is still (just!) possible to implement by November 2015 but that an Ofgem decision is required as soon as possible to enable Shippers to get on with scheduling and making the required (mostly IT based) changes.

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

No.

#### Relevant Objectives:

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*How would implementation of this modification impact the relevant objectives?*

We agree with those set out by the proposer.

**Impacts and Costs:**

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

See above. We would also note that the less lead time that is provided to industry generally, the more costly it will be to implement this Mod.

**Implementation:**

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

As much lead time as possible is required, hence the need for a quick Ofgem decision.

**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.