

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: British Gas Trading Ltd
Representative: Chris Wright
Date of Representation: 21 January 2014

Do you support or oppose implementation?

Support.

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

We recognise that this modification proposal has been raised as a result of the implementation of the European CAM network code, allied to decisions made by DECC, to standardise and align the gas day across Europe. We regard this proposal as necessary in order for GB and National Grid to ensure compliance with the revised gas day timing of 05:00 – 05:00. Nevertheless, we note ongoing discussions about the extent to which the GB upstream production industry may be required to change its mode of operations in order to align with the proposed onshore gas day, even though such a change is not required by the aforesaid Code. It is possible that there will be significant costs associated with this. We believe that this upstream aspect may not have been given due consideration at the time the CAM network code was being developed and agreed.

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

No.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the views of the proposer.

Impacts and Costs:

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

We expect to face some (as yet unquantified) internal system development, testing, and implementation costs.

0461

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21 January 2014

Version 1.0

Page 1 of 2

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Implementation:

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

As stated in the proposal.

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?

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.