

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: EDF Energy
Representative: Natasha Ranatunga
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.

EDF Energy supports the implementation of the Third Package; this includes the adoption of the European Capacity Allocation Mechanism (CAM) network code and the change to the start of the gas day from 06:00 to 05:00. We recognise that whilst the CAM network code only applies to the GB interconnection points, the European Network Code on Balancing will require the application of a common gas day across Europe including the domestic markets.

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.

We believe that it is important to emphasise the potential conflict of timings of industry change deliverables that are being proposed to be delivered on or around the 1st October 2015, including;

- Project Nexus
- DCC go-live for smart metering
- Change of Supplier reform
- Other changes due to other European network codes

We expect National Grid and Xoserve to ensure that it manages efficiently the interactions of the delivery of numerous systems changes at once.

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

No.

0461
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Version 1.0

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Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the proposer's views that implementation of this modification would have a positive impact on Relevant Objective (g) and would enable National Grid to comply with the Regulation and any relevant legally binding decisions of the European Commission.

Impacts and Costs:

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

EDF Energy anticipates that there will be a number of changes required to our internal systems. Delivering these changes in an increasingly congested systems development programme is challenging especially in light of the number of other system developments that are taking place across the industry.

Implementation:

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

We would welcome a decision from Ofgem as soon as possible in order to enable us to commence our system development programme.

Legal Text:

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

We are satisfied that the legal text 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.

No.