

Representation

Draft Modification Report

0476S – Alignment of DN Charging Methodology with RIIO-GD1 Arrangements

Consultation close out date: 06 February 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: Wales & West
Representative: John Edwards
Date of Representation: 05 February 2014

Do you support or oppose implementation?

Support

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

This modification updates section Y of UNC to reflect the changes to transportation charging methodology following the implementation of RIIO GD1 price control and also removes the reference to interruptible transportation charges following the cessation of interruptible charging arrangements from Oct 201.1

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

There are no additional issues which we feel should be recorded in the modification report.

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

We agree with the Modification Panel's decision that this modification fits the criteria to be classified as a self-governance modification, principally because it will have no material effect on existing or future gas customers and does not discriminate against any particular UNC party

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

"That so far as is consistent with sub-paragraph (a), the charging methodology properly takes account of developments in the transportation business"

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Version 1.0

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The modification reflects the changes to the charging methodology in respect of the way in which the exit capacity costs are recovered and the method for dealing with K. In addition, following the end of interruptible charging arrangements from Oct 2011 this modification removes that particular reference from the charging methodology in Section Y of UNC.

Impacts and Costs:

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

We do not believe there will be any costs incurred as a result of this modification being implemented.

Implementation:

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

As the modification is reflecting what is happening in practice we see no reason why the modification cannot be implemented 16 business days after a vote in favour of implementation by the Modification Panel.

Legal Text:

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

We are satisfied with the legal text.

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.

We do not believe there is anything further to be taken into account.