

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: RWE Supply & Trading GmbH
Representative: Charles Ruffell
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.

Implementing this modification proposal will facilitate compliance with the requirements of the Capacity Allocation Mechanism (CAM) code and other codes where the Gas Day definition is referenced. Introducing a common Gas Day across the European Union will support the development of effective competition in the EU gas market which is an objective that we endorse.

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.

Compliance needs to be achieved by the time that the CAM code is implemented on 1st November 2015. Internally, we will be able to meet these timescales provided that there is a timely decision that gives us certainty to commit the necessary resources. A part of this will be early clarity on the outcome of ongoing discussions on the extent of any technical and/or contractual changes that the upstream gas industry will need to make to manage an 05.00 to 05.00 Gas Day downstream. If decisions are delayed or the required changes are extensive, this may necessitate an extension to the implementation date.

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?

We agree implementation will have a positive impact on Code Relevant Objective(s)

g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

Impacts and Costs:

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

We expect to incur some system development costs and potentially some legal costs should contract amendments be required.

Implementation:

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

Our response to Q1 above notwithstanding, we agree that an implementation of date 1st October 2015 is appropriate. Irrespective of the date, Users need to be certain of any specific arrangements to deal with the cut-over from an 0600:0600 to 0500:0500 gas day.

Legal Text:

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

Yes, 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.

Nothing further.