

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: ScottishPower Energy Management Ltd
Representative: Gerry Hoggan
Date of Representation: 27 January 2014

Do you support or oppose implementation?

Support

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

We are supportive of the objectives of the Third Package and recognise that this will require some measure of change and compromise as a result of the consequential move towards increased levels of harmonisation and alignment.

One such aspect is the adoption of the 0500 to 0500 Gas Day as specified in the Capacity Allocation Mechanism (CAM) Network Code but with that definition then carrying over to the other codes such as the Balancing Network Code and the wider implications for domestic markets that flow from there.

We recognise that this view is not universally held, amongst upstream producers in particular who continue to question the need for such a far reaching change with what they consider to be little perceived benefit. However allowing for the potential scope and scale of consequential IT System changes required, and related lead times, it would not be prudent to await the outcome of that challenge before making the necessary preparations for change. As such the presumption must remain that this change will be required and we must work towards it until such times as we might be directed otherwise.

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.

The lead times for IT system changes is crucial although to this point we have not yet had a chance to evaluate those impacts precisely. We are however conscious of other ongoing industry change such as Project Nexus and Smart Metering that are scheduled for delivery around the same time and that could be adversely impacted and would urge that those possible impacts are fully considered and appropriate steps taken to address or mitigate them.

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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 set out by the proposer and as detailed in the Workgroup Report.

Impacts and Costs:

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

We recognise that inevitably some IT system changes will be required, at a time when numerous other such Industry changes are having to be implemented and with the consequential management and budgetary issues that arise as a consequence.

Implementation:

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

An early decision from Ofgem would be welcome as obviously greater lead time to implement the necessary IT changes would be most welcome.

Legal Text:

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

We are comfortable 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.