

## Representation

### Draft Modification Report

#### 0458 – Seasonal LDZ System Capacity Rights.

**Consultation close out date:** 22 April 2014  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** SSE Supply  
**Representative:** Mark Jones  
**Date of Representation:** 22 April 2014

#### Do you support or oppose implementation?

Support

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

This modification would allow large customers to use spare capacity in the summer months only and this usage would then not be included within the winter calculation of capacity requirements. This would obviate the need to reinforce the system and so avoid potentially significant capital investment.

#### Modification Panel Members have indicated that it would be particularly helpful if the following could be addressed in your response:

**Q1** - Your view is sought on whether this modification furthers Relevant Objective (d) in addition to those stated (a, b and c):

We do not believe that this modification furthers relevant objective (d) as the transportation costs to all shippers for customers under these arrangements would be the same.

#### 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 proposer that this modification will positively impact relevant objectives (a), (b) and (c) for the reasons detailed within the modification.

#### Impacts and Costs:

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

None identified.

**Implementation:**

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

This modification could be implemented as soon as possible after an Authority decision.

**Legal Text:**

*Are you satisfied that the legal text 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.