

Representation

Draft Modification Report

0473 0473A – Project Nexus – Allocation of Unidentified Gas

Consultation close out date: 13 Nov 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: Winchester Gas
Representative: Huw Comerford
Date of Representation: 03 November 2014

Do you support or oppose implementation?

0473 – Oppose

0473A - Support

If either 0473 or 0473A were to be implemented, which would be your preference?

0473A

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

We support the intent of both modifications to appoint an expert to determine the allocation of unidentified gas (UG), however it is due to the transitional rules in 0473 that mean we are only able to support 0473A. To not allocate UG to Class 2 sites is essentially giving Shippers the option of opting out of UG allocation for any supplies for which they are able to provide daily reads to the Transporter. If Shippers are able to opt out of UG allocation we believe this could affect competition within the market during the transitional period.

Modification Panel Members have indicated that it would be particularly helpful if the following questions could be addressed in responses:

Q1: Please provide as much information and analysis to support your response, particularly any justification for why any particular class should, or should not, attract unidentified gas costs.

We believe that all Classes should be subject to an allocation of UG as this is an industry issue and as such not allocating UG to certain Classes could be a disincentive to Shippers, whose portfolio is mainly in that Class, from actively detecting UG.

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Q2: We welcome views on the attribution of unidentified gas costs under these modifications to NTS direct-connected sites.

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

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We believe that 0473 would have a negative effect on relevant objective D if shippers are able to opt out of UG allocation.

Impacts and Costs:

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

Implementation:

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

Legal Text:

Are you satisfied that the legal text and the proposed ACS (see www.gasgovernance.co.uk/proposedACS) will deliver the intent of the modification?

There is only a draft version of the legal text for 0473A at present.

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.