

## Representation

### Draft Modification Report

#### 0493 - EU Gas Balancing Code - Daily Nominations at Interconnection Points (IP)

**Consultation close out date:** 06 November 2014

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** British Gas Trading Limited

**Representative:** Graham Jack

**Date of Representation:** 04 November 2014

#### Do you support or oppose implementation?

Support

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

We recognise that new nomination procedures are required at interconnection points to enable the implementation of EU network codes. The modification proposal has been developed in consultation with Users at the European Workgroup.

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

The rules that adjacent Transporters will use for matching nominations and renominations are expected to be set down in Interconnection Agreements (to which only the adjacent Transporters will be parties). We expect these rules to be transparent to Users but are concerned that, should Users want to have these rules amended, they may only be able to do so with the express agreement of the Transporters.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

Implementation of the modification will ensure compliance with relevant objective g).

#### Impacts and Costs:

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

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Systems and processes will need to be amended and/or developed to allow Gas Operations to process nominations and renominations at interconnection points. We do not anticipate the costs being high. We would expect National Grid to provide timely opportunity to discuss and test systems and processes before implementation.

**Implementation:**

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

Implementation should be just in time to meet the requirements of the relevant European network codes.

**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.*

Only to refer to the concern expressed above regarding transparency and governance of the matching rules.