

Representation - Draft Modification Report 0510

Reform of Gas Allocation Regime at GB Interconnection Points

Responses invited by: **24 April 2015**

Representative:	D.C. Pol
Organisation:	BBL Company
Date of Representation:	23-04-2015
Support or oppose implementation?	Qualified Support with Comments
Relevant Objective:	(g) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

BBL Company supports the OBA allocation principles presented but with some comments related to the close out dates presented and the differences regarding the alignment between the hourly allocation regime of BBL Company and the daily allocation regime of National Grid.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

No comments

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

No comments

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

BBL agrees that the legal text delivers the intent of the Solution. However, BBL has comments on the legal text which are detailed in the next section.

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

Remark to 3.2.1 (b): the close out dates should be split in close out dates per flow direction. For the NTS Entry flows the close out date should be M+15 and for the NTS Exit flows the close out date should be D+5.

The comments below relate to a current issue that BBL is discussing with National Grid about how proportional allocation would be applied, given that BBL operates an hourly allocation regime and National Grid applies a daily regime.

Remark to 3.2.1. (c): the net sum of the Counterparty Quantities and the Steering Differences for that gas day are equal to the Measured Quantity for that gas day.

Remark 3.2.2 (b): the EPDQ is the sum of the Counterparty Quantities + all the Steering Difference on all OBA hours during a gas day.

Remark 3.2.2 (e): The Steering Difference for the non-OBA day zero, only for those non-OBA hours on the gas day.

Remark 3.2.3, 3.2.4, 4.1.1, 4.1.2: Add the close out date split in being the Exit Close-out date (D+5) and Entry Close-out data (M+15).

Remark 3.3.2 (a) (i): BBLCompany interpretation is that this forward direction means the BBL forward flow into the NTS system. If so, the formula used is incorrect possibly due the previous remark at 1.2.4. If it concerns the volume delivered into the NTS only the Measured Quantity would suffice, this because this is the net outcome of the forward, reverse and oba allocated flows.

Remark 3.3.2 (c): the Steering Difference for the Non-OBA day is zero, only for the non-OBA hours on that gas day.

Please provide below any additional analysis or information to support your representation

No comments.