

## Representation - Draft Modification Report 0510V

### Reform of Gas Allocation Regime at GB Interconnection Points

Responses invited by: **6<sup>th</sup> August 2015**

<b>Representative:</b>	Phil Hobbins
<b>Organisation:</b>	National Grid NTS
<b>Date of Representation:</b>	
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<b>g)</b> Positive

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

As Proposer, National Grid NTS supports 0510 as varied. National Grid NTS considers that the amended solution adequately addresses the proportional allocation issue that BBL Company highlighted in its consultation response.

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

Implementation is required no later than 1<sup>st</sup> October 2015 in order to facilitate the planned start of OBA arrangements at the Interconnection Points with effect from that date.

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

This Modification is part of a wider suite of UNC changes which need to be implemented in order to comply with the European Network Codes. No specific costs have been identified for this Modification.

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

Yes.

**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.*

No.

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

National Grid NTS was supportive of the Panel's decisions to re-open the 0510 workgroup after consultation and to re-issue the amended text for re-consultation. National Grid NTS considers that the variation request satisfies the identified issue and that the Modification should now proceed to Ofgem for a decision.