

Representation - Draft Modification Report 0563S

Moving the NTS Optional Commodity Charge Formula into the UNC

Responses invited by: **15 January 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Anna Shrigley
Organisation:	Eni Trading & Shipping SpA
Date of Representation:	14/01/2016
Support or oppose implementation?	Support
Relevant Objective:	b) Positive e) Positive

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

Eni believes that the right way forward is for the NTS Optional Commodity Charge (OCC) to be moved from the NTS Transportation Statement to the UNC TPD, Section Y, because then any party will be able to propose a change to the formula rather than just National Grid. This change will better facilitate achievement of the Relevant Charging Methodology Objectives (b) and (e).

Self-Governance Statement: *Please provide your views on the self-governance statement.*

In eni's view, this mod meets the self-governance criterion because the proposed change is unlikely to have any material effect on competition in the shipping, transporting or supply of gas conveyed through pipelines or any commercial activities related to this process because the change will only move an existing formula from the Transportation Statement into the UNC in order to better reflect current UNC terminology.

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

Ideally as soon as possible.

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

Eni do not envisage any impacts in relation to implementation of mod 563 S.

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

None.