Joint Office of Gas Transporters

Representation - Draft Modification Report UNC 0685

Amendment of the UNC term 'Gas Deficit Warning' to 'Gas Balancing Notification'

Responses invited by: 5pm on 21 May 2019

To: enquiries@gasgovernance.co.uk

Representative:	Phil Hobbins
Organisation:	National Grid NTS
Date of Representation:	17 May 2019
Support or oppose implementation?	Support
Alternate preference:	n/a
Relevant Objective:	**a)** Positive **e)** Positive

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

National Grid NTS supports implementation because the current 'Gas Deficit Warning' term implies that there is insufficient gas available to meet demand which may not necessarily be the case. It could therefore be misinterpreted, causing unnecessary alarm and consequently uneconomic outcomes and detrimental impact to the GB gas market. The proposed 'Gas Balancing Notification' term is a more accurate description in that when such a notice is issued, it is a signal to GB gas market participants to either put more gas into the network or reduce demand.

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

We believe that the Modification is likely to have the material effects set out in the Draft Modification Report and therefore support Authority Direction.

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

Implementation by 1st October 2019 would be desirable to realise the benefits of this Modification for this winter.

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

We would need to update the term in a number of our publications, on our website and in our internal operational procedures. We would not face any analysis, development or ongoing costs.

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

No further comments.