

Representation

Draft Modification Report

0489 - EU Gas Balancing Code - Information Provision changes required to align the UNC with the EU Code

Consultation close out date: 18 July 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: EDF Energy
Representative: John Costa
Date of Representation: 18 July 2014

Do you support or oppose implementation?

Support

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

The proposed changes in this modification proposal, namely the addition of a NDM forecast at 12:00 D-1, a NDMA Accuracy report and the provision of allocation data before the end of 1st day after the gas day (D+1), are necessary to comply with the EU Balancing Code (No.312/2014).

Apart from having to comply with the EU Balancing Code, which is legally binding, the extra NDM forecast at the 12:00 day ahead stage will allow suppliers to be able to better predict the final consumption of their NDM customers while the NDMA accuracy report will also be helpful in understanding accuracy of demand forecasts vs outturn, although we note that many Shippers will already perform this calculation themselves. What would be more useful would be additional information related to accuracy, particularly standardised information about, for example, high level metering feeds into the forecasts that may have been based on estimated rather than actual readings, and any other standard explanatory data that affect NG forecast accuracy. In terms of frequency, we believe this report should be published on an annual basis rather than on a two year basis under the EU Balancing code.

In terms of the D+1 allocation data requirement we note that this is already provided to Users one day after the gas day but the UNC needs to be changed as the current obligation states "by the second day (D+2)".

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

None, other than the extra data requirements stated above which would make the Accuracy report more worthwhile.

Relevant Objectives:

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How would implementation of this modification impact the relevant objectives?

We agree this modification would meet relevant objective G to comply with binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

Impacts and Costs:

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

N/a

Implementation:

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

We recognise the timeline for implementation has to be before the 1 October 2015 EU Balancing Code deadline however we believe this modification should be implemented as soon as practically possible to benefit Users prior to October 2015.

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.

No