

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: National Grid NTS
Representative: Debbie Brace
Date of Representation: 16th July 2014

Do you support or oppose implementation?

Support

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

As the proposer of this Modification, National Grid NTS fully supports implementation.

Commission Regulation (EU) No 312/2014 - Network Code on Gas Balancing of Transmission Networks specifies the information to be provided by Transmission System Operators (TSO's) to Users. Implementation of this Proposal would satisfy the requirements to provide shippers with a forecast of non daily metered offtakes for gas day D-1 by 12:00, a report on the accuracy of the non daily metered forecasts and amends the timing of the provision of allocation data to Users before the end of the 1st day after the gas day (D+1).

The rules contained within the Regulation supersede any prevailing GB legislation, and require National Grid NTS as the Transmission System Operator (TSO) in GB to implement these rules by 1st October 2015. We believe implementation of Modification Proposal 0489 would achieve legal compliance with the EU Regulation at minimal change and cost.

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

No

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We consider that Modification 0489 better facilitates Relevant Objective (g) to comply with the European Commission Regulation; Network Code on Gas Balancing of Transmission Networks, which

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became EU law on 26th March 2014. The Proposal satisfies the requirements to provide shippers with a forecast of non daily metered offtakes for gas day D-1 by 12:00, a report on the accuracy of the non daily metered forecasts and amends the timing of the provision of allocation data to Users before the end of the 1st day after the gas day (D+1).

Impacts and Costs:

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

This Proposal is part of a wider suite of UNC changes proposed to achieve compliance with the European Network Code that needs to be implemented by 1st October 2015. No specific costs have been identified for this Proposal although we believe them to be minimal.

Implementation:

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

The Proposal advocates an implementation date of 1st October 2015 which corresponds with the date for compliance with the Network Code on Gas Balancing of Transmission Networks.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

National Grid NTS is satisfied that the legal text delivers the intent of the Modification Proposal.

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