

## Representation

### Draft Modification Report

#### 0497 – Removal of the CSEP NExA table held within Annex A part 8

**Consultation close out date:** 19 September 2014  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** British Gas Trading  
**Representative:** Andrew Margan  
**Date of Representation:** 04 September 2014

#### **Do you support or oppose implementation?**

Support

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

Across the gas industry the CSEP NExA table is provided across multiple codes. This can result in the tables becoming misaligned and holding different values, which can cause confusion.

This proposal will place an obligation on Transporters to update the UNC table to reflect the latest IGT AQ data.

We believe aligning the codes is good governance and will avoid confusion as to which values to use.

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

None identified

#### **Relevant Objectives:**

*How would implementation of this modification impact the relevant objectives?*

As above we believe this proposal will have a positive effect on the Promotion of efficiency in the implementation and administration of the Code.

#### **Impacts and Costs:**

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

None identified

#### **Implementation:**

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

To link the UNC proposal to the IGT UNC solution, we believe this proposal requires a decision and implementation before April 2015. Therefore we suggest a decision is made by Q1 2015 at the latest.

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**Legal Text:**

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

National Grid Distribution state no legal text is required for this change, therefore there is none provided to review.

As long as the Transporters meet this new obligation we are comfortable with this position, although it is not clear what vires shippers have, if the work is not completed.

**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.*

In the future we expect the IGT UNC and the UNC to align further. This could result in the IGT UNC and UNC merging fully, resulting in the need for a single CSEP NExA Table, i.e. a single table is referenced to by both parts of the IGT UNC and UNC. We believe this could lead to greater efficiency in the implementation and administration of the Codes.