

Representation - Draft Modification Report 0541A/B

Removal of uncontrollable UNC charges at ASEPs which include sub-terminals operating on a 06:00 - 06:00 Gas Day

Responses invited by: **5pm 11 April 2016**

Representative:	David Eastlake
Organisation:	Claims Validation Services Limited
Date of Representation:	5 th April 2016
Support or oppose implementation?	0541A - Support 0541B - Support
Alternate preference:	<i>If either 0541A or 0541B were to be implemented, which would be your preference?</i> 0541A/0541B
Relevant Objective:	d) Positive g) Positive

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

CVSL is aware of negative impacts on shippers of having to time-shift adjust the Entry Allocation Statement results from 05:00 to 06:00. It supports measures to reduce these negative impacts.

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

CVSL is required to implement a series of steps prior to amending Claims Validation arrangements to cater for the proposed UNC change. Specifically, in order to amend the Claims Validation Services Agreement (between CVSL/shippers) it must:

- 1) circulate a paper detailing principles of proposed change
- 2) Convene a General Meeting and approve a resolution approving the proposed change to CVSA
- 3) Prepare and circulate draft amending agreement for 28 day review period by shippers
- 4) Prepare a further draft reflecting shipper comments and submit this second draft to shippers for a vote (90% in favour threshold to succeed).

Additionally, any reflective changes to the Claims Validation Agency Agreement will require to be negotiated with the Claims Validation Agent (GMSL).

CVSL therefore need a minimum of 90 days between approval of the modification and its implementation, noting that it will then have 30 days to collect historic allocation data back to 1/10/15 in a format to be agreed with National Grid and deliver it.

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

No detailed costings of implementing 0541 A or B have yet been undertaken by the Agent, noting that it is by no means certain that a Mod will be approved and CVSL wish to keep potentially abortive expense to an absolute minimum.

Indicatively the costs of complying with 0541 are modest (2 man-weeks?) and any costs will be charged to shippers at GMT sub-terminals as incurred (operating cost)

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Modification Panel Members have requested that the following questions are addressed:

Q1: Respondents' views are requested on the applicability of User Pays arrangements, with supporting reasons.

No view

Q2: Respondents' views on the six key areas of impact described in the Impact Assessment, in Section 4, of the Draft Modification Report are also invited.

No view

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 view

Please provide below any additional analysis or information to support your representation

none