

Representation - Draft Modification Report 0572

Amendment to the definition of AUG Year within UNC TPD Section E

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

To: enquiries@gasgovernance.co.uk

Representative:	James Hill
Organisation:	EDF Energy
Date of Representation:	Friday 8 April
Support or oppose implementation?	Qualified Support
Relevant Objective:	d) None

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

EDF Energy agrees in principle with the intent of UNC 0572; however we do not believe that the Draft Modification Report sets out very clearly the relative merits of an AUG Table published in either October or April or the arguments and for/against either option. We would expect that this should include the impact of the introduction of a disconnect between the effective date of the transportation rates and the AUG year, which are aligned in the current and the 473 AUG processes.

The Draft Modification Report does not set out how the transition will be managed and when this transition will happen. It was highlighted at the January 2016 workgroup it may not be possible for UNC 0572 to be implemented before October 2018, the Draft Modification Report states it should be implemented at the Project Nexus Implementation Date which is 1 October 2016 in the middle of an AUG year. The consequences of the implementation date do not appear to have been explored.

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

No comments

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

Further information is required

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

n/a

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.*

See above

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

n/a