

Representation

Draft Modification Report

0454: Introduction of a Long Term Non Firm Capacity Product

Consultation close out date: 12 December 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: Gazprom Marketing & Trading Limited
Representative: Ric Lea
Date of Representation: 12 December 2013

Do you support or oppose implementation?

Support

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

Gazprom Marketing & Trading (GM&T) support the measures this modification takes to bring about consistency between project development timescales and current capacity availability.

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

None

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Agree as per the modification report.

GM&T note that while there will be an obligation to price interruptible capacity based on the probability of interruption at IPs, the impacts on this relevant objective will require review depending on the future developments of the GB charging regime per EU network codes.

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?

The implementation of this modification should have sufficient lead time to allow full alignment with the overall industry processes and documentation involved in development projects.

Legal Text:

Are you satisfied that the legal text and the proposed ACS (see www.gasgovernance.co.uk/proposedACS) 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.

None