

Representation received by Email

0478 - Filling the gap for SOQ reductions below BSSOQ until Project Nexus

Date: 21 February 2014

Organisation:

Major Energy Users Council (MEUC)

Abstract:

Supports implementation of Modification 0478.

No additional comments to those supporting the implementation of Modifications 0275 and 0405.

I do not have any real evidence to support the need for the change, in conversation with members a number have expressed interest but without commitment. An equal number have said that if the change is made they will not use it as they would rather retain the spare capacity in case of future need.

However I believe this rule is outdated, was inherited from the monopolistic British Gas and needs to be changed. It reflects the prevailing attitude of the time that the Transporter knows the gas requirements of a consumer better than he does himself. It also reflects the distrust of this new group called shippers as few understood their role. The rule retains the dictatorial attitude that existed at the beginning of competition.

It should also be pointed out that the change to the capacity/commodity split has doubled the impact of this rule.

I believe if the change is of benefit to only a single DM site it should still be made.

Regards,

Eddie Proffitt