

## Representation

### Draft Modification Report

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

**Consultation close out date:** 21 March 2014

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** Southern Gas Networks & Scotland Gas Networks

**Representative:** David Mitchell

**Date of Representation:** 21 March 2014

#### Do you support or oppose implementation?

Support

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

SGN supports this modification as it will remove constraints on Daily Metered Supply Points by allowing end users to amend their Bottom Stop Supply Point Capacity during the capacity reduction period where they experience significant changes to their gas usage. By allowing an SOQ to be reduced below the BSSOQ quicker than otherwise would have been allowed will give the DNO the opportunity to plan their networks more efficiently. This may mean that network reinforcement on sensitive parts of the network may not be required or it could mean that interruption contracts will not have to be negotiated with end users.

#### 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?*

This modification meets relevant objective (a), as it will introduce a means of ensuring that the correct SOQ is modelled on a network, thus allowing for the efficient and economic operation of the pipeline system. Relevant objective (c) is also facilitated as the modification allows the DN discharge their licence obligation to operate an efficient network. This modification supports networks in the efficient targeting of investment on their networks which could otherwise result in costly reinforcement projects being required to support a demand that is no longer being placed on the network.

#### Impacts and Costs:

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

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None have been identified

**Implementation:**

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

Implementation before October 2014 would be desirable

**Legal Text:**

*Are you satisfied that the legal text 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.*

No