

## Representation - Draft Modification Report UNC 0844

### Enabling Direct Contractual Arrangements with Consumers for Demand Side Response

Responses invited by: **5pm on 13 July 2023**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

*Please note submission of your representation confirms your consent for publication/circulation.*

<b>Representative:</b>	Arjan Geveke
<b>Organisation:</b>	Energy Intensive Users Group
<b>Date of Representation:</b>	13 July 2023
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	<p>a) Positive</p> <p>b) Positive</p>
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

The EIUG supports the proposal enabling direct contractual arrangements with consumers for demand side response. Direct contractual arrangements between large gas consumers and National Gas might lead to increased volumes as it reduces transaction costs compared to going via suppliers/shippers. It would mean gas users will find it easier to engage with the DSR process and enter bids.

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

The EIUG agrees with the timetable that National Grid Gas is following.

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

Direct contractual arrangement will reduce the cost for large gas users to engage with gas DSR.

**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.*

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

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