

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

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

Representative:	Bethan Winter
Organisation:	Wales & West Utilities
Date of Representation:	13 th July 2023
Support or oppose implementation?	Support
Relevant Objective:	a) Positive b) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

We support this modification on the basis that it helps mitigate the risk of supply emergencies. WWU believes this modification furthers relevant objective a) Efficient and economic operation of the pipe-line system and relevant objective b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.

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

No requirement as our changes can be implemented promptly once the process for notification has been agreed with National Gas Transmission.

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

New processes within our System Operation function to receive and process information relating to implementation of DSR by any sites in our network. This needs to be factored into our demand forecasts and Offtake Profile Notifications so that the benefit is seen on the Transmission network.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

We have no concerns with the legal text.

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.*

None

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

None