

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:	Louise Hellyer
Organisation:	TotalEnergies Gas & Power
Date of Representation:	10/07/23
Support or oppose implementation?	Qualified 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)

TGP support the premise of this modification and most of the applications. Overall this is step forward compared to the current arrangements. The area TGP would like to see made more robust is in notifications for the shipper and supplier, if there was a notification to the shipper and supplier when an option was called this would help assist communications and ensure everyone was prepared for all actions. There could also be a small hole in notification if the end customer transfers supply between acceptance of the offer and when it is called upon. You could be in a situation where the shipper/supplier is not aware of an agreement being in place. Again, some notification flow in this situation would be beneficial.

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

It would be good to get this in ready for the auction for winter 2023

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

No signification cost. Additional notifications would assist in limiting any unintended costs linked to scheduling etc.

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

N/A not reviewed

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.*

No Further Comments

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

No Further Comments