

## 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>	David Mitchell
<b>Organisation:</b>	Scotland Gas Networks Ltd & Southern Gas Networks Ltd
<b>Date of Representation:</b>	12 <sup>th</sup> July 2023
<b>Support or oppose implementation?</b>	Comments
<b>Relevant Objective:</b>	<b>a)</b> Positive <b>b)</b> Positive
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

SGN believes that this modification has the potential to be a useful mechanism that could provide support to the gas network in times of system stress by establishing a direct contractual arrangement between National Gas Transmission (NGT) and individual Class 1 gas consumers. The introduction of a direct relationship between NGT and Class 1 consumers who agree to enter into a Demand Side Response (DSR) arrangement should provide added flexibility to the process. From an SGN perspective our main concern is that we must receive timely notifications when a DSR is triggered on consumers site as this will help us manage our network planning activities.

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

SGN supports the proposed implementation timescale that have been set out in the draft modification, we believe that it would be advantageous to implement this modification in advance of the winter period 2023/24.

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

SGN does not anticipate any cost as a result of this modification being implemented.

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

We are satisfied 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 identified.

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

We do not have any further analysis or information to provide.