

Joint Office

enquiries@gasgovernance.co.uk

19/02/2024

Dear Sir or Madam,

0854 – Revision of Virtual Resort User and Contingent Procurement of Supplier Demand Event Triggers

Thank you for the opportunity to provide representation on the above noted Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

NGN supports this Modification Proposal.

Reason for support/opposition:

We support this modification allowing National Gas Transmission to extend the availability of the Virtual Last Resort User and Contingent Procurement of Supplier Demand provisions to include instances where UPTN is issued as a result of UK Government sanctions being imposed. This should allow the continuation of balancing and transportation until an alternative User Registration is in place for the impacted MPRNs, thereby furthering Relevant Objectives a) *Efficient and economic operation of the pipe-line system*, c) *Efficient discharge of licensee's obligations* and d) *Securing of effective competition between relevant Shippers*.

Implementation:

As this is Authority Direction, it should be implemented on a date as directed by the Authority. However, as this mitigates risk we would encourage this to be as soon as practicable.

Impacts and Costs:

None identified.

Legal Text:

We believe that the legal text provided should deliver the Solution set out in the proposal.

Are there any errors or omissions in this Modification Report that you think should be taken into account?

None identified.

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

None.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Tracey Saunders (via email)
Markets Regulation Manager
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