

Representation – Draft Modification Report UNC 0866S Amendments to Demand Side Response (DSR) Arrangements

Responses invited by: 5pm on 03 May 2024

To: enquiries@gasgovernance.co.uk

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

Representative:	Tom Stuart
Organisation:	Wales & West Utilities
Date of Representation:	25.4.24
Support or oppose implementation?	Support
Relevant Objective:	a) Positive b) Positive
Relevant Charging Methodology Objective:	Not Applicable

Reason for support/opposition: *Please summarise the key reason(s) for your support or opposition.*

In general, measures that can be taken to encourage consumers to participate in demand side response and ultimately reduce the likelihood of a gas deficit emergency occurring provides obvious economic and societal benefits. We believe this modification achieves this by making DSR more attractive for consumers and therefore we support this modification.

We agree with the proposers assessment that the modification furthers relevant objective a) Efficient and economic operation of the pipe-line system and 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.

Noting NGT’s obligation to communicate with GDNs when DSR is exercised and the introduction of DSR options, GDNs gaining details of sites that are signed up to DSR would help NGT realise the full DSR benefit. This would be more effective for NGT because sites do not nominate their load to the GDN (unless they have a Network Exit Agreement) and so the GDN would have difficulty in adjusting their forecast and effectively adjust their intake from the NTS to pass on the benefit. If details were known in advance the GDN could plan and manage the load accordingly.

Governance Statement: *Please provide your views on the self-governance statement or reasons why Authority Direction should apply.*

We agree this modification should be self governance.

Impacts and Costs: *Please provide a view on the impacts and costs you would face.*

We do not anticipate any cost impacts

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

This modification should be implemented as soon as reasonable practicable.

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

Yes

Panel Questions: *Panel Members have requested that the following questions are addressed.*

Panel identified four aspects which may affect the suitability for self-governance:

Q1. In light of the proposed change in treatment to the bid-stack (BR 4), do you consider that this Modification is suitable for Self-Governance procedures? Can you provide evidence relating to materiality?

No Response

Q2. Given the extension to Class 2 (BR 17), do you consider that this Modification is suitable for Self-Governance procedures? Can you provide evidence relating to materiality?

No Response

Q3. Given the change in credit support (see BR 18), do you consider that this Modification is suitable for Self-Governance procedures? Can you provide evidence relating to materiality?

No Response

Q4. In light of the approach taken to Modification 0852, do you consider that this Modification is suitable for Self-Governance procedures? Can you provide evidence relating to materiality?

No Response

Error or Omissions: *Are there any errors or omissions in this Modification Report that you think should be taken into account? Please include details of any impacts/costs to your organisation that are directly related to this.*

Insert Text Here

Additional analysis: *Please provide below any analysis or information to support your representation.*

No Response