

Representation - Draft Modification Report UNC 0856

Introduction of Trials for Non-Daily Metered (NDM) Demand Side Response (DSR)

Responses invited by: 5pm on 04 December 2023

To: enquiries@gasgovernance.co.uk

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

Representative:	Kirsty Ingham / Oorlagh Chapman
Organisation:	Centrica
Date of Representation:	4 Dec 2023
Support or oppose implementation?	Qualified Support
Relevant Objective:	<p>a) Positive</p> <p>b) Positive</p> <p>f) None</p>
Relevant Charging Methodology Objective:	Not Applicable

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

We support this Modification in principle as an enabler for NDM DSR trials to be developed with relevant stakeholders, and to be designed with goals including consideration and protection of vulnerable gas users, consumer safety and clear definitions of the desired outcomes.

Significant work is required to progress to the stage of launching trials. There are many gas-specific issues that need to be addressed, and which make the development of frameworks for NDM DSR much more complex than those for the electricity Demand Flexibility Service. We are keen to engage with NGT and other relevant parties on the understanding and development of solutions, prior to the introduction of any genuine trial.

Relevant Objective a) “Efficient and economic operation of the pipe-line system”

As an enabling Modification, ahead of the detailed development of trials and any wider implementation, there is potential for positive impacts against baseline.

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”

As an enabling Modification, ahead of the detailed development of trials and any wider implementation, there is potential for positive impacts against baseline.

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

The Modification itself may be implemented this winter, however due to the many issues that need to be addressed in order for trials to go ahead, including those associated with vulnerable customers and practical implementation in a gas context, we suggest that it is overly ambitious for NGT to intend to begin trials in winter 2023.

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

No costs or impacts from the Modification itself. There will be costs and impacts from the development of scope, terms and implementation of the subsequent trials themselves, but this cannot yet be quantified.

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

We have not reviewed 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

This Modification was discussed as part of Transmission Workgroup, which is generally attended by those concerned with transmission network related issues. In our view there has been insufficient engagement with suppliers of NDM customers, as the parties most directly impacted by the trials that will result from the Mod. We would welcome further engagement on NDM DSR in a more suitable, or preferably specific, forum with experts present.