

Transco NTS Response to UNC Modification Proposal 0022
“Revision to Section O – Removal of references to the Base Plan Assumptions Document”

Transco NTS’s Position

Transco NTS supports implementation of this Modification Proposal

Below is Transco NTS’s detailed response to the Modification Proposal: -

1. The Modification Proposal

Transco NTS supports implementation of the Proposal. Non implementation of this Proposal would perpetuate the present situation with potential for duplication and inefficiency.”

2. Extent to which implementation of the proposed modification would better facilitate the relevant objectives

The proposal is to remove the references to the Base Plan Assumptions document from UNC Section O. All references to Base Plan Assumptions are to be removed or replaced by references to Transporting Britain’s Energy or the Transco Ten Year Statement. It is also proposed to move the sections that are currently in the section titled Base Plan Assumptions to the section titled the Ten Year Statement. Transco NTS believes that the introduction of its TBE process has enhanced information provision and provided a planning cycle that is well understood by all industry participants and therefore the Proposal will further the relevant objectives set out in Standard Special Condition A11, specifically (c),” the efficient discharge of the licensee’s obligations under this licence.”

3. The implications of implementing the Modification Proposal on security of supply, operation of the Total System and industry fragmentation

The enhanced information through TBE has already provided greater clarity in the risks associated with security of supply, it has also promoted the need and subsequent response for new import projects to meet the UK’s growing import dependence.

4. The implications for Transporters and each Transported of implementing the Modification Proposal, including

a. Implications for operation of the System:

Whilst no obvious operational system implications are identified, increased upstream information assists operational planning

b. Development and capital cost and operating cost implications:

Transco NTS does not anticipate incurring any development or capital costs as a consequence of implementing this Modification Proposal

c. Extent to which it is appropriate to recover the costs, and proposal for the most appropriate way to recover the costs:

Transco NTS believes that no additional costs will be incurred

d. Analysis of the consequences (if any) this proposal would have on price regulation:

Transco NTS does not anticipate consequences on price regulation

5. The consequences of implementing the Modification Proposal on the level of contractual risk of each Transporter under the Code as modified by the Modification Proposal

Implementation of this Modification Proposal will not increase Transco NTS’s exposure to contractual risk.

6. The high level indication of the areas of the UK Link System likely to be affected, together with the development implications and other implications for the UK Link Systems and related computer systems of each Transporter and Users

Transco NTS has not identified any impact on the UK Link System or any other NTS IS systems.

7. The implications of implementing the Modification Proposal for Users, including administrative and operational costs and level of contractual risk

Transco NTS does not expect any change for Users in these areas.

8. The implications of implementing the Modification Proposal for Terminal Operators, Consumers, Connected System Operators, Suppliers, producers and, any Non Code Party

In terms of information provision and subsequent industry feedback, Transco NTS believes that Users support the TBE process as an improvement on the previous BPA arrangements.

9. Consequences on the legislative and regulatory obligations and contractual relationships of each Transporter and each User and Non Code Party of implementing the Modification Proposal

Transco NTS does not believe there to be any direct consequence in this area on implementation of the Modification Proposal.

10. Analysis of any advantages or disadvantages of implementation of the Modification Proposal

a. Advantages

As Proposer, Transco NTS has outlined the advantages of implementation within the Modification Proposal. Transco NTS recognises the advantages already in existence through TBE and a streamlining of its planning process. This has also brought about increased industry awareness of its responsibilities to provide Transco NTS with information. As a consequence, Transco NTS is now better informed to make investment decisions and provide key industry feedback relating to future supply and demand.

b. Disadvantages

Transco NTS has not identified any disadvantages of implementation.

11. Summary of Representations received (to the extent that the import of those representations are not reflected elsewhere in the Modification Report)

N/A

12. The extent to which the implementation is required to enable each Transporter to facilitate compliance with safety or other legislation

Transco NTS notes that implementation is not required for this purpose.

13. The extent to which the implementation is required having regard to any proposed change in the methodology established under paragraph 5 of Condition A4 or the statement furnished by each Transporter under paragraph 1 of Condition 4 of the Transporter's Licence

Transco NTS notes that implementation is not required having regard to any such proposed change.

14. Programme for works required as a consequence of implementing the Modification Proposal

Transco NTS notes that no programme of works is required

15. Proposed implementation timetable (including timetable for any necessary information systems changes)

Transco NTS has identified that implementation of the proposal can be facilitated as soon as a decision is received.

16. Implications of implementing this Modification Proposal upon existing Code Standards of Service

Transco NTS does not anticipate there being any implications upon Code Standards of Service as a consequence of implementing this Modification Proposal