

Representation - Draft Modification Report UNC 0753

Removal of Pricing Disincentives for Secondary Trading of Fixed Price NTS System Entry Capacity

Responses invited by: **5pm on 11 June 2021**

To: enquiries@gasgovernance.co.uk

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

Representative:	Anna Shrigley
Organisation:	Eni Global Energy Markets SpA
Date of Representation:	2 June 2021
Support or oppose implementation?	Support
Relevant Objective:	c) Positive d) Positive g) Positive
Relevant Charging Methodology Objective:	c) Positive e) Positive

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

We agree with the proposer of the UNC Mod 753 that:

- it is necessary to rectify material inconsistency between the Code and relevant legal requirements and that this change will have a material beneficial effect on commercial activities relating to the shipping, transportation and supply of gas.
- the MOD would increase liquidity in the secondary capacity market, which can be expected to result in the more economically efficient allocation of capacity

Article 22 of the Gas Directive stipulated that capacity rights should be freely tradable and non-discriminatory, which would be better achieved by enabling UNC 753, we therefore support this modification as a transitory solution until full entry capacity assignment rights are available.

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

As soon as possible and at least 30 days prior to the start of the new Gas Year on 1 October 2021.

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

N/A

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

N/A

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.*

N/A

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

N/A