

Modification Proposal 0047: Additional Data Requirements for DM Capacity Referrals

Thank you for providing Scotia Gas Networks (SGN) with the opportunity to comment on the above modification proposal.

SGN supports the proposal as outlined in the Draft Modification Report. We believe that the additional data items required of Users and timescales in which a Transporter is required to respond to an application by a User should improve the robustness and efficiency of the capacity referral process.

We believe the additional data items set out and requested by Transporters are relevant and reasonable. They should help ensure the Transporter's assessment of any request for additional capacity is conducted in a thorough and timely manner. They should help to minimise the need for subsequent requests for additional information and associated delays. Requests should be dealt with using up to date and accurate information.

We note the proposal suggests that the Transporter may be able to reject a request where the data items specified have not been provided. It is not entirely clear how this would be implemented or incorporated into legal text but we would anticipate that every effort would normally be made to obtain or provide such data, allowing the Transporter to carry out a thorough assessment and provide a timely and robust response. It should only be necessary to invoke such arrangements in exceptional circumstances.

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

SGN believes the above modification proposal will better facilitate the relevant objectives. By improving the accuracy of the information on which such requests are assessed, it should ensure the economic and efficient development and operation of the pipe-line system.

Implications for operation of the System

The provision of the additional data should help ensure the Transporter's decision is based on the most accurate and robust information, improving the appropriateness and efficiency of such decisions.

Implications for Users

Whilst Users would be required to provide additional data at the outset, this data should be readily available. It should not require any significant additional effort or cost for customers or Users. It could be argued that by making requirements clearer from the outset. It should also help ensure that request can be dealt with quicker as there should be little or no need for additional, ad-hoc requests that can often slow the process down. The proposal also sets out clear timescales within which Users can expect to receive a response. This should make it easier for Users to monitor and manage the process.

We hope you find these comments helpful.

Regards

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