

## **Representation For. 0061**

"Facilitating further demand-side response in the event that a Gas Balancing Alert is triggered"  
Version 1.0

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**Slant:** For  
**Strictly Confidential:** No

### **Abstract**

CIA supports this proposal to ensure that further balancing actions might be considered following the triggering of a Gas Balancing Alert and prior to the declaration of a Network Gas Supply Emergency (NGSE).

We agree that National Grid NTS should be able to take actions not only using the OCM but also "over the counter (OTC)" contracts where National Grid NTS considers it to be economic and efficient to do so. We note that National Grid NTS will only take OTC contracts with non-OCM participants who are Shippers.

We welcome the additional flexibility through the fact that National Grid NTS would be able to take multiple (consecutive) days following that specific Gas Day for which the action is being taken up to, and including, seven consecutive days.

The situation for this winter is tight and has not been experienced before and we welcome the work done in order to ensure that there are no barriers to providing demand side response.

CIA agrees that a full review of the System Operator balancing role should be undertaken in the fullness of time and definitely before next winter. This review should start as soon as possible.

We note that this proposal introduces additional complexity and may not be welcome by some participants. We are also aware that the methodology for how a multi-day trade feeds into cash-out is not ideal and that this may need to be reviewed again. However, given the time constraints for this winter we believe that this modification should be implemented in its current form.