

SGN Response to Mod 0100: Amendment to OPN/SFN Submission

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Thank you for providing SGN with the opportunity to comment on the above modification proposal.

SGN does not support the above proposal.

Whilst SGN agrees with the principles of this proposal, it is imperative that NG have access to accurate information in order to deliver the best demand forecasts, SGN believe that earlier provisions of information will not be of any significant value. It is likely that more assumptions may have to be made by those providing the information at an earlier stage. This may not therefore not deliver the level of benefit anticipated. There needs to be a balance between accuracy and timeliness of information and SGN are concerned that earlier provision of information in this case will not improve accuracy.

It is proposed that implementation could be immediate and any costs would possibly only be administrative. However consideration has not been given to potential consequences for bilateral agreements, particularly NExAs. To accommodate this proposal SGN believe NExAs would need to be renegotiated with each individual End User , and this is likely to take time to agree . Furthermore, we believe there will also be operational and procedural consequences that have not been thought through and will take time to implement. We believe wider industry discussion is required to fully asses consequences and appropriate timescales in order to ensure the proposal delivers the benefits anticipated and not reduce accuracy of forecasts and information provided to the industry.

We hope you find these comments helpful.

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