

Representation

Draft Modification Report

0370 – Continuation of CV determination by National Grid Transmission on behalf of DNOs

Consultation close out date: 08 April 2011
Respond to: enquiries@gasgovernance.co.uk
Organisation: **National Grid Transmission**
Representative: Phil Lucas
Date of Representation: 5 April 2011

Do you support or oppose implementation?

Support.

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

As existing (time limited) contractual provisions expired on 1 April 2007, implementation of this Proposal would provide a contractual basis for the ongoing provision of a service by National Grid Transmission (NGT) to determine daily Calorific Values (CV) on behalf of Distribution Network Operators (DNOs). NGT has agreed to the continuation of the service. However, should this situation change, we note that the proposed terms would enable NTS or DNOs to provide notice to discontinue the arrangement. As detailed below, we believe that implementation of this Proposal would better facilitate one of the relevant objectives.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

NGT notes that this matter has been the subject of numerous discussions at the Offtake Arrangements Workstream since 2007 and that no issues have been raised in respect of the proposed continuation of the service.

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

This Proposal seeks to provide a contractual basis for ongoing provision of an existing service which the current provider and, we believe, all current recipients wish to continue. Therefore we agree that implementation is unlikely to have a material effect upon the above parties and existing processes detailed in the self governance criteria and is unlikely to unduly discriminate between the relevant parties to the UNC.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

NGT agrees with the Proposer that implementation of the Proposal would better facilitate the promotion of efficiency in the administration of the implementation and administration of the Uniform Network Code by formalising the prevailing method of determination of CVs.

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

There are no additional analytical, development or ongoing costs that would be incurred by NGT in the event that this Proposal was implemented.

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

For the reasons highlighted above, this proposal could be implemented with immediate effect subject to the appropriate direction from the Modification Panel.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

We believe that the suggested text detailed within the Draft Modification Report appropriately reflects the intent of the Proposal.

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

NGT does not believe that there are any other further issues the need to be taken into account.