

Representation - Draft Modification Report UNC 0600S

Amend obligation for the acceptance of EPDQD revisions made after D+5

Responses invited by: **5pm on 09 March 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Graham Jack
Organisation:	British Gas Trading Limited
Date of Representation:	9 th March 2017
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

The modification proposal provides a pragmatic solution for the provision of accurate entry point daily quantities. Without such a solution gas shippers are exposed to potential failures or mistakes by terminal operators and National Grid. Implementation of the proposal will provide gas shippers with more confidence that their efforts to daily balance face a reduced uncontrollable exposure. In turn, this will help to support the intentions behind the daily balancing regime.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

We agree with the self-governance status of this proposal.

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

Implementation should be as soon as possible.

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

None identified.

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

The legal text is adequate. We would have preferred the text to have referred to a form of reasonable endeavours obligation on National Grid to permit late revisions which will

be the most accurate view of the entry point daily quantity for that day. This would provide shippers with even greater confidence that, contractually, the late revisions to the daily quantities would be allowed and that they will be allocated their final correct delivery quantities.

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.*

None identified.

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