

Representation

Modification Proposal

0393: Interruptible to Firm – NTS Supply Point Transition

Consultation close out date:	03 February 2012
Respond to:	enquiries@gasgovernance.co.uk
Organisation:	British Gas Trading Limited
Representative:	Chris Wright
Date of Representation:	29 December 2011

Do you support or oppose implementation?

Support

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

The transition to a fully firm NTS takes effect from 1 October 2012, and has been known about for some significant time. Both shippers and National Grid should therefore have had plenty of opportunity to begin planning for this transition. This proposal adds clarity to the process and timescales for shippers to re-nominate interruptible supply points as firm. It will also help to ensure a smooth and ordered transition to fully firm in instances where any shipper has not completed the process of their own volition, and National Grid is required to do it on their behalf.

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

No.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We consider that implementation of this proposal would better facilitate the efficient administration of the UNC.

Impacts and Costs:

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

Nugatory.

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Implementation:

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

We agree with the proposers timetable – that this proposal should be implemented in March 2012.

Legal Text:

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

Yes.

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.

No.

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