

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:	David Eastlake
Organisation:	Claims Validation Services Limited
Date of Representation:	8 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)

Retaining the ability to amend DQs after D+5 is essential to support the timely and accurate provision of Entry Allocation Statements (EAS) to NG. Flexibility enables many over-sold sub-terminal positions to be eradicated. This has been effectively used since 1996 and there would be significant cost implications for shippers if the status quo is not maintained. Much of the information used to derive the EAS comes from processes that are not part of the UNC (producer and sub-terminal positions) and allocations may change at any time up until M+15. Additionally, it should be remembered that the Option A solution to the Gas Flow Day is dependant upon changes being able to be made after the current D+5 DQ deadline. This process would be undermined by not having as much flexibility as possible before actual close-out on M+15.

CVSL is in favour of the 10:00 M+15 cut-off in the Mod for DQ changes. This will remove the risk of the DQ being changed on M+15 after CVSL has closed out and submitted the monthly Entry Allocation Statement to Gemini. Where this happens the EAS will not exactly match the DQ and per UNC the EAS for any affected sub-terminal day is ignored by Gemini and the default position of nominations applies. This is therefore a worthwhile constraint in the process.

It has been suggested that M+12 be used as the cut-off for DQ changes. If this were the case CVSL would lose its capacity to solve over-sold conditions where the DQ needs to be changed as part of the solution. CVSL needs the M+12 to M+15 window to be able to make changes and ensure high quality EASs are delivered to NG.

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

None

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

None

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

Unknown, but in all likelihood significant costs would be borne by shippers if the D+5 DQ deadline was enforced

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

Yes

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

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

None