

# Representation

## **Draft Modification Report**

0438S: Update of UNC TPD Section Y to reflect Exit Reform Arrangements

Consultation close out date: **07 February 2013** 

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** National Grid NTS

Richard Hounslea Representative:

**Date of Representation:** 07 February 2013

## Do you support or oppose implementation?

Support

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

This UNC modification was raised in order to update and tidy-up the National Grid Transmission Transportation Charging Methodology contained in UNC TPD Section Y. The arrangements for NTS Exit Reform are currently contained in Appendix C of the methodology.

Previously, when the methodology sat outside of the UNC document, National Grid NTS undertook these updates and tidy-ups as part of its annual review. Now that the methodology is part of the UNC, any updates must follow the UNC Code Governance processes. This UNC modification effects the relocation of the charging arrangements for NTS Exit Reform from Appendix C into the main body of the Charging Methodology. The modification takes the opportunity to make further updates to reflect NTS Exit Reform charging arrangements and correct a number of minor typographical errors, which had been identified.

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

We do not believe there are any new or additional issues to record within the Modification Report.

#### **Self Governance Statement:**

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

The proposer agrees with the Modification Panel's decision that this modification should be classed as self-governance as its implementation would 0438S not discriminate between different classes of UNC parties, or have a material effect on existing or future gas customers, competition

(other than its promotion), operation of the pipeline system(s),

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matters relating to sustainable development, safety or security of supply, or the management of the market or network emergencies.

## **Relevant Objectives:**

How would implementation of this modification impact the relevant objectives?

## b) Taking into account of developments in the transportation business.

This modification seeks to update UNC TPD Section Y so that it properly reflects National Grid Transmission's charging arrangements from 1st October 2012. To that extent, implementation of this modification would better facilitate relevant objective b) that, so far as is consistent with sub-paragraph (a), the charging methodology properly takes account of developments in the transportation business.

#### **Impacts and Costs:**

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

National Grid NTS has identified that no further analysis, development or ongoing costs will be incurred as a result of implementing this modification and, as the changes are to reflect arrangements already in place for the purposes of NTS Exit Reform, no system changes or changes NTS manual process will be necessary. This is not a User Pays modification.

## **Implementation:**

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

Without prejudice to any decision by the Modification Panel on whether or not to implement this modification, National Grid NTS believes this modification can, and should, be implemented 16 business days after the decision to implement.

#### **Legal Text**:

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

National Grid NTS is satisfied that the legal text will deliver the intent of the modification.

#### 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.

National Grid NTS does not believe there is anything further to be taken into account.

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