

Representation - Draft Modification Report 0535

Implementation of Non Effective Days to enable Annual AQ Review (independent of Nexus transition)

Responses invited by: **12 June 2015**

Representative:	Mark Lyndon
Organisation:	National Grid NTS
Date of Representation:	11/06/2015
Support or oppose implementation?	Support
Relevant Objective:	d) Positive f) Positive

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

National Grid NTS supports the implementation of non - effective days to facilitate the AQ review process. The implementation of this proposal will remove the likelihood of inaccurate AQ data propagating into Gemini. That could lead to misinformed User positions, and subsequent energy balancing differences that lead to inaccurate invoicing charges.

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

National Grid NTS supports the desired Implementation date of the 02 July 2015 to add certainty to the process.

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

None

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

National Grid NTS is satisfied with the proposed legal text.

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.*

No

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

National Grid NTS believes the proposal will further relevant objective f) Promotion and efficiency in the implementation and administration of the Code, by allowing the Transporter Agency sufficient timescales to validate and distribute information within the UK Link Systems and to Users.

National Grid NTS agrees with the Proposer that this Modification eliminates significant changes to central systems that would have otherwise been required to support Modification 0477 i.e. to enable the confirmation period and provision of data to Gemini on the same day.

National Grid NTS also concurs with the proposer's view for relevant objective d) facilitation of effective competition between shippers, since accurate AQ information will prevent the situation where inaccurate data is transferred into Gemini at D-1 for publishing, and will eliminate inaccurate forecasts for Shipper Demand which enables NDM energy to be apportioned correctly.