

## Representation

### Draft Modification Report

#### 0373: Governance of NTS connection processes

**Consultation close out date:** 30 March 2012

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

**Organisation:** Scotland & Southern Gas Networks

**Representative:** Erika Melén

**Date of Representation:** 30 March 2012

#### Do you support or oppose implementation?

Support

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

SGN are in support of this modification as it offers clarity, transparency and clear timescales to the NTS connections process both for direct connects, storage and potential new DN offtakes.

We do however wish to note that we do not feel that it would be appropriate to apply a similar process to connections to the LTS on the distribution network. DNOs are currently obligated by Licence Condition 4B in terms of connections and we feel that this is sufficient. Also, due to competition in the area of DN connections, should this type of arrangement be specified, it could lead to an unfair competitive advantage for other parties operating in this market.

#### 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 agree that the introduction of these transparent arrangements will better facilitate the relevant objectives outlined in the MOD373 Workgroup Report.

#### Impacts and Costs:

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

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None

**Implementation:**

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

This should follow the appropriate timescales as outlined by National Grid NTS in their MOD373 consultation representation.

**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