

Representation

Draft Modification Report

0420: New Connections Interruptible loads

Consultation close out date: 07 September 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: Scotia Gas Networks
Representative: David Mitchell
Date of Representation: 04 September 2012

Do you support or oppose implementation?

Support

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

Scotia Gas Networks supports this Modification to the UNC as it helps to facilitate new connections onto gas distribution networks by allowing new connections the option to have a temporary interruptible gas supply contract. This modification promotes the efficient use of spare capacity available on the network allowing end users to use this capacity while the network operator reinforces their network to meet peak demand.

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

N/A

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

This modification will better facilitate relevant objectives **a** and **b** as it allows the network operator to use any spare capacity in its network, thus ensuring that the network is used in the most efficient way possible. This modification will also remove unnecessary delays for new gas connections further supporting the relevant objectives.

Impacts and Costs:

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

None identified

Implementation:

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

This modification could be implemented following an authority decision

Legal Text:

Are you satisfied that the legal text [and the proposed ACS (see www.gasgovernance.co.uk/proposedACS)] will deliver the intent of the modification?

SGN 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.

SGN currently has a number of enquiries for new gas connections that would benefit from this modification being implemented. These enquiries are from large companies who are dependent on having a gas supply, enabling them to connect to the network early will be good for UK Plc.

New gas connections could currently been seen to be discriminated against under the current UNC arrangements as there is no flexibility to allow any gas to be off taken from the network even if the network is able to satisfy the demand in the majority of instances. However users who already have a connection onto the network wishing to have an increase in their load are currently able to enter into the interruptible tender process if there isn't sufficient capacity on the network in times of peak demand. It could be argued that the industry is discriminating against parties who don't have an existing gas supply by not allowing them to enter into tge tender process. Therefore this modification will address the inbalance that currently exists.