

Representation

Draft Modification Report

0376 and 0376A: Increased Choice when Applying for NTS Exit Capacity

Consultation close out date: 06 January 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: ScottishPower Energy Management Ltd

Representative: Gerry Hoggan

Date of Representation: 6 January 2012

Do you support or oppose implementation?

We would support the implementation of either 0376 or 0376A.

If either 0376 or 0376A were to be implemented, which would be your preference?

Our preference would be for 0376 to be implemented for the reasons stated below.

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

The current arrangements appear unnecessarily and unduly restrictive. The increased flexibility that would be provided by either of these modifications as regards applicable timescales, and particularly 0376 with its additional reduced trigger threshold, would be beneficial in allowing users to secure capacity more closely aligned to their operational timetables and capacity requirements. This will bring particular benefits for such as developers of new and/or refurbished CCGT power stations where commissioning dates and incremental efficiency improvements may well be significant factors in investment decisions.

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

No

Self Governance Statements:

Do you agree with the Modification Panel's decision that these should be self-governance modifications?

Yes

0376/0376A

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06 January 2012

Version 1.0

Page 1 of 2

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Relevant Objectives:

How would implementation of these modifications impact the relevant objectives?

We agree with the Modification Report's assessment that implementation of either modification would better facilitate Code Relevant Objectives (c) and (d), being the efficient discharge of the licensee's obligations and securing of effective competition respectively.

The latter objective would appear particularly well served as users would be able to align required volumes and start dates more accurately, leading to more efficient allocation and use of capacity, more efficient system investment and more cost reflective expense for shippers.

Impacts and Costs:

What analysis, development and ongoing costs would you face if these modifications were implemented?

We would incur a share of the implementation costs but these would be relatively insignificant.

Implementation:

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

To provide the maximum benefit and flexibility from the change it would be appropriate for it to be implemented as soon practicable.

Legal Text:

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

We are comfortable that the legal text provided would deliver the intent of each of these modifications.

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.