

Representation

Draft Modification Report

0443 - Arranging Flow Swaps between NTS/LDZ Offtakes with increased lead times or for prolonged periods

Consultation close out date: 07 June 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: Wales & West Utilities
Representative: Robert Cameron-Higgs
Date of Representation: 07 June 2013

Do you support or oppose implementation?

Support

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

We support this proposal as it mitigates the risk for Transporters by establishing a Long Term Flow Swap Agreement. This can be agreed between Transporters in advance of the current restrictions which currently only allow this formal agreement at D-1. The increased certainty this gives both parties, allows for better planning for all.

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

No

Self-Governance:

While the Panel decided this is not a Self-Governance Modification, the Proposer subsequently asked for this to be reconsidered. Ofgem has agreed to look at changing this to a Self-Governance Modification if this course of action is supported by consultation responses. What is your view on the suitability of self-governance?

This is a matter which impacts solely on Transporters and has no impact on customers or Shippers. As such, we support it being a Self Governance proposal.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

This proposal satisfies Relevant Objectives (a) and (b) as by improving planning and certainty around offtake use, both sets of Transporters are making efficient and economic operation of the pipe-line system and combined pipe-line system.

Impacts and Costs:

0443
Representation
07 June 2013

Version 1.0

Page 1 of 2

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

Any additional analysis would be business as normal costs and would not increase costs to the Transporter.

Implementation:

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

Implementation is sought asap to allow for summer 2013 maintenance activities

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.
