

## 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:** **Wales & West Utilities**

**Representative:** Robert Cameron-Higgs

**Date of Representation:** 04 January 2012

#### **Do you support or oppose implementation?**

**0376** - Qualified Support

**0376A** - Qualified Support

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

0376

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

Modification proposals 0376 and 0376a both offer an increased level of flexibility when a User applies for Enduring NTS Exit (Flat) Capacity, by extending the time for application from Y+4 to Y+6, and for a start date on the 1<sup>st</sup> of any month between October Y+4 and September Y+6, not restricted to 1<sup>st</sup> October.

Proposal 0376 further allows applications at a reduced threshold of 1GWh/d (from 10 GWh/d).

WWU offers qualified support for these proposals. There are benefits to their implementation for all Users, however the benefit potentially gained by DNO Users is not consistent with the high level of User Pays charges proposed for DNOs.

WWU believe a more appropriate apportionment of the User Pays charges should be Gas Transporters [25%], other Users [75%], with DNOs paying [10%] (of the combined Transporter [25%] amount).

0376/0376A  
Representation

---

04 January 2012

---

Version 1.0

---

Page 1 of 2

---

© 2012 all rights reserved

**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

**Relevant Objectives:**

*How would implementation of these modifications impact the relevant objectives?*

Relevant objectives b & c would be satisfied by either proposal.

**Impacts and Costs:**

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

The User Pays element of these proposals should be amended to more appropriately reflect the impacts and costs associated with Users benefiting from this change.

**Implementation:**

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

Implementation 16 days after the Modification Panel decision (subject to User Pays arrangements).

**Legal Text:**

*Are you satisfied that the legal text will deliver the intent of each 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.*

Beyond comments on User Pays arrangements, nothing to add.