Representation - Draft Modification Report UNC 0627S

Removal of the absolute requirement to include a Remotely Operable Valve (ROV) Installation for all new NTS Exit connections

Responses invited by: 5pm on 07 December 2017 **To:** enquiries@gasgovernance.co.uk	
Representative:	Graham Jack
Organisation:	British Gas Trading Limited
Date of Representation:	6th December 2017
Support or oppose implementation?	Support
Relevant Objective:	Relevant Objective **d)** Positive Section Y (Charging Methodology) Modifications **b)** Positive **c)** Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

The proposal is to provide National Grid with discretion on whether they will install a remotely operable valve (ROV) at NTS exit points, compared with the current situation where the installation of ROVs is a requirement. If implemented, the proposal will provide scope for reducing new connection costs whilst ensuring, through HAZOP assessments, that the safe operation of the NTS is maintained. The code change will help to encourage new connections and greater use of the system, and consequently will have a positive impact on the identified relevant objectives.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

Self-governance is appropriate.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

As soon as practicable.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

None identified.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

None identified.

Please provide below any additional analysis or information to support your representation