Representation - Draft Modification Report UNC 0628S Standard Design Connections: PARCA process

Responses invited by: 5pm on 12 July 2018

To: enquiries@gasgovernance.co.uk

Representative:	Graham Jack
Organisation:	Centrica
Date of Representation:	12 July 2018
Support or oppose implementation?	Support
Relevant Objective:	a) None – we are not persuaded that the proposal will further this relevant objective as it ought not to have any bearing on the operation of the operation of the pipeline system
	c) <u>Positive</u> – the proposal will help to improve access to the pipeline system by enabling less complex projects to secure capacity more efficiently.
	d) Positive – providing cheaper and quicker access to capacity is consistent with promoting competition between gas shippers and gas suppliers. Regarding NTS exit capacity, however, there is scope to improve the PARCA process to provide shippers who may want additional capacity at potential donor substitution exit points a fairer opportunity to compete for it – but this is a situation that already exists.

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

The proposal has been raised in support of Project CLoCC that has the objective of providing quicker and less costly connections to the NTS. Enabling an applicant to secure capacity in a more efficient manner where possible is critical to the achievement of this goal and this modification proposal will help to achieve this. We believe that the proposal will help to further code relevant objectives c) and d).

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

We support self-governance for this proposal.

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

As soon as practicable and in conformance with self-governance procedures.

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?

No comment.

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