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5th September 2019
Your Reference: UNC Modification Proposal 0696

UNC Modification Proposal 0696 - Addressing inequities between Capacity booking under the UNC and arrangements set out in relevant NExAs

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal which Cadent does not support.

Do you support or oppose implementation?

Oppose

Relevant Objective:

d) Negative

f) Negative

Reason for support/opposition:

It is our view that the specific situation which led to the raising of this Modification, including the inclusion of a retrospective element, was foreseeable and appears to have arisen due to a lack of communication between the Shipper and the customer regarding whether a NExA is in existence and the date any provisions came into effect.

As the Shipper had booked capacity on the system, this would not be available to other Shippers and therefore if a refund is due back to the Shipper for the capacity booked (but not paid for as a consequence of the refund) this would appear to be a detriment to all other Shippers and therefore Relevant Objective d) would be Negative.

Whilst we agree that there may be benefit in improving the current process to enable better alignment of NExAs and capacity bookings, our view is that the solution within this modification is limited so at best Relevant Objective f) would be no change.

Implementation

Implementation should be as soon as possible after an Authority decision.

Impacts and Costs

Difficult to assess currently but we would expect a number of system changes which will impact Cadent.

Legal Text

Legal text is not available at the time of submission of this representation

Are there any errors or omissions in this Modification Report that you think should be taken into account?

We have not identified any errors or omissions.

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

We have not identified any additional analysis or further information over and above what has previously been stated.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 07884 113385 (andy.clasper@cadentgas.com) should you require any further information.

Yours sincerely,

Andy Clasper
Framework Specialist, Regulatory Strategy