

Joint Office
enquiries@gasgovernance.co.uk

27 April 2020

Dear Sir or Madam,

Re: 0723U Use of the Isolation Flag to identify sites with abnormal load reduction during COVID-19 period

Thank you for the opportunity to provide representation on the above noted Urgent Modification Proposal. Please find below Northern Gas Network's (NGN) comments in respect of this change.

NGN supports this Urgent Modification Proposal.

Reason for support/opposition:

Please summarise (in one paragraph) the key reason(s)

We support this proposal as it should further Relevant Objective a) *Efficient and economic operation of the pipe-pipe system* by redressing some of the economic impacts experienced due to a change in gas usage caused by COVID-19 impacts. The introduction of a temporary use of the isolation flag to allow shippers to deem as isolated, sites that have ceased usage or are only using de minimis amounts, due to the restrictions in place during the COVID-19 period, will prevent these sites from receiving energy allocation and the corresponding LDZ commodity charge, whilst the deemed isolation is in place.

It should also further Relevant Objective *Securing of effective competition* by ensuring that gas allocations are more accurately apportioned across Supply Meter Points which are actively consuming gas during the COVID-19 period.

Implementation:

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

This proposal could be implemented as soon as Ofgem approval is received.

Impacts and Costs:

What analysis, development and ongoing costs would you face?

No required analysis or development, or ongoing costs, have been identified for NGN as a result of this proposal.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the Solution?

We believe the legal text provided should deliver the Solution set out in the modification.

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.

Smell gas?

Call the National Gas Emergency
Service on 0800 111 999

None identified.

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

None.

I hope these comments will be of assistance and please contact me should you require any further information in respect of this response.

Yours sincerely,

Tracey Saunders (via email)
Market Services Manager (Industry Codes)
Mobile: 07580 215 743

Smell gas?

Call the National Gas Emergency
Service on 0800 111 999

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Thorpe Park Business Park
Colton, Leeds LS15 8TU

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**we are
the network**