

Representation - Draft Modification Report UNC 0720S

Amendments to the Agreed Target Quantity at the Moffat Interconnection Point

Responses invited by: 5pm on 11 September 2020

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Kirsty Ingham Kamila Nugumanova
Organisation:	ESB GT
Date of Representation:	10/09/20
Support or oppose implementation?	Support
Relevant Objective:	a) Positive

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

We are supportive of National Grid Gas's (NGG) intention to minimise inaccuracies in data received through ATQ. Improvements in data will lead to more efficient operation of the system and will reduce the potential for unnecessary balancing actions. Savings and benefits arising from the change will consequentially be transferred to consumers.

We support the proposed approach as the most pragmatic and cost-efficient way to address the issues with changing within-day nominations data. We also agree with the inclusion of both GNI and PTL Tripartite Agreements in the proposed solution.

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

We support the self-governance route for this modification. Our understanding is that the proposed solution will make amendments to the procedural and data quality elements of both GNI and PTL Tripartite Agreements, specifically the way in which the ATQ is calculated. The modification does not propose to make any changes to the way final system balancing is performed or to any other system processes. Therefore, it is unlikely to have any material impact on the overall system operation or system users.

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

We agree with the proposed self-governance procedures and a resulting implementation in sixteen working days after a Modification Panel decision.

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

We do not anticipate any significant costs arising from the implementation of this modification.

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

A high-level review of the legal text demonstrates that all key elements of the Tripartite agreements and relevant clauses have been addressed in accordance with the proposed solution. We trust that both the proposer's as well as Tripartite agreement parties' qualified legal advisors would have performed necessary full-scale review to ensure there are no inconsistencies or contentious amendments.

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.*

No comments

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

No comments