

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:	Malcolm Montgomery
Organisation:	National Grid
Date of Representation:	11/09/20
Support or oppose implementation?	Support
Relevant Objective:	a) Positive

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

As proposer of this modification we support its implementation, in summary this change allows a more accurate (end of day) physical flow nomination to be submitted at Moffat by the operator of the interconnector. More accurate and timely data regarding gas flow on or off the network will allow all parties to make better commercial and/or operational decisions, and therefore furthers RO (a) efficient and economic operation of the pipeline system.

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

This modification relates to a single exit point on the network and so while this modification will bring incremental improvement to data provision, it is not judged to have a material enough impact on the whole market that would warrant Authority intervention.

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

This is an enabling modification for the interconnection agreements at Moffat to be amended. National Grid will be looking to amend the agreements with the relevant parties (in line with the modification) at the earliest opportunity and it is a requirement for the modification to be implemented before these agreements can be amended. As self-governance is proposed the modification could be implemented from 16 days following the modification Panel decision to Implement.

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

There are no ongoing costs to consider.

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

This is technically 'N/A' as there is no legal text change to the UNC. However, it should be noted that we believe that the changes proposed to the interconnector agreements reflect the description contained within the modification proposal.

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.

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

N/A.