

Representation - Draft Modification Report UNC 0755

Enhancement of Exit Capacity Assignments

Responses invited by: **5pm on 09 July 2021**

To: enquiries@gasgovernance.co.uk

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

Representative:	Daniel Hisgett
Organisation:	National Grid NTS
Date of Representation:	09 July 2021
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

As proposer of this Modification we support its implementation, the Modification proposes to enhance the current Assignment offering by providing the ability to assign Capacity at Exit Points both in full and in partial volumes. Enhancing Exit Capacity Assignments gives Users an increased level of flexibility, and reduces the risks associated with booking longer term Capacity. The ability to assign partial volumes also benefits Users by allowing them the option to take on long-term liabilities, from those Users who no longer require a proportion of their existing long-term Exit capacity holding, rather than relying on the short-term markets to fulfil their obligations to customers leading to more efficient use of capacity.

As a result of the increased flexibility the Modification gives Users, we therefore believe that this modification furthers Relevant Objective (d) for the reasons outlined in the Draft Modification Report.

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

The timescales proposed in the modification suggest a Spring 2022 release at the earliest. Gemini system changes are required to implement this change and therefore it would be prudent to consider the optimal approach to implementation. To implement as efficiently as possible, we are exploring bundling these proposed changes in to one larger release with the changes required in other recently approved, capacity-related, modifications.

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

Implementation Costs provided by Xoserve/Corella within the ROM were expected to be between £235k - £295k.

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

Yes, the Legal Text satisfies the intent of the solution.

Modification Panel Members have requested that the following questions are addressed:

Q1: Respondents to provide a view as to whether or not this modification should be redesignated as self-governance.

The modification proposes the enhancement of an existing process. It is not expected to negatively impact any users of the existing processes and may make it more accessible for others.

We do not believe that the change or the expected impacts trigger any of the requirements for this to be considered as Authority Direction, as a result we believe that Self-Governance is the appropriate governance path for this 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.*

None.

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

No additional analysis is required.