

Joint Office

Enquiries@gasgovernance.co.uk

2nd August 2022

Dear Joint Office,

Re UNC Modification: 0805 Introduction of Weekly NTS Exit Capacity Auctions

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

NGN does NOT support this Modification Proposal.

Reason for opposition

We do not support this Modification due to its discriminatory nature in relation to Distribution Networks (DNs). Whilst the proposer claims that 'Permitting DNs greater flexibility in capacity booking may create issues for National Grid NTS in its operation and planning of the NTS' this seems in conflict with the fact that DNs have, under UNC Transportation Principal Document (TPD) Section B, the ability to use daily auctions. Should a situation arise where we needed to make a short-term booking, the ability to use a weekly, rather than numerous daily options, should reduce any perceived issues, therefore excluding DNs from this option would appear counter intuitive. In view of this we believe that this proposal is negative for Relevant Objectives

a) Efficient and economic operation of the pipe-line system.

Implementation:

As this modification is not classed as self-governance, should it be approved, it can be implemented at any time as directed by The Authority.

Impacts and Costs:

None identified.

Legal Text:

Whilst we note that there is a new clause 3.5 to exclude DNO users from weekly auction, we believe that due to the fact that under section TPD B a User (with limited exceptions) includes a DNO user; paragraph 3.1.5 (b) & 3.5.4 should state 'Shipper User' rather than 'User', or refer to proposed clause 3.5 which excludes DNO Users from Weekly Auctions.

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

None identified.

Smell gas?

Call the National Gas Emergency
Service on 0800 111 999

a 1100 Century Way
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Colton, Leeds LS15 8TU

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w northerngasnetworks.co.uk

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the network**

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

We are not averse to the inclusion of Weekly NTS Capacity Auctions as an addition to the existing auction options for all Users (both Shipper and DNO), and would support a modification proposal that was inclusive to all User parties as defined under TPD B 1.12

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

Mobile: 07580 215 743

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