

Representation - Draft Modification Report UNC 0805 Introduction of Weekly NTS Exit Capacity Auctions

Responses invited by: **5pm on 12 August 2022**

To: enquiries@gasgovernance.co.uk

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

Representative:	David Mitchell
Organisation:	Scotland Gas Networks Ltd & Southern Gas Networks Ltd
Date of Representation:	12 th August 2022
Support or oppose implementation?	Comments
Relevant Objective:	a) Negative d) Negative
Relevant Charging Methodology Objective:	Not Applicable

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

SGN would like to offer comments in response to this consultation.

SGN supported the initial version of this modification and we are, in principle, in favour of introducing Weekly NTS Capacity Auctions.

However, we have concerns that the modification as now drafted will discriminate against different classes of user, as not all parties will be able to utilise the facility of weekly NTS Exit Capacity Auctions. It is our view that the GDNs should also be able to use the facility, which would benefit our customers and could in turn prove to be more cost reflective.

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

We support the proposed implementation lead times.

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

SGN does not anticipate any costs from the implementation of this modification.

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

We are satisfied that the legal text will deliver the intent of 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.*

None identified.

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

None identified.