

Representation Draft Modification Report

Modification 0822 - Reform of Gas Demand Side Response Arrangements

- 1. Consultation closes out date:** 22nd September 2022
- 2. Respond to:** enquiries@gasgovernance.co.uk
- 3. Organisation:** Securing Energy For Europe (SEFE) Energy
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- 4. Representative:** Steve Mulinganie
Regulation Manager
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0799 097 2568 / 0751 799 8178
- 5. Date of Representation:** 21 September 2022
- 6. Do you support or oppose Implementation:**
We **Support** implementation of the Modification
- 7. Please summarise (in 1 paragraph) the key reason(s) for your position:**
The current arrangements have been proven to provide an insufficient level of incentive for customers to proactively support voluntary curtailment. With the current market volatility and potential constraints, it is important to ensure that all the arrangements that are in place to mitigate these risks remain fit for purpose and are subject to continuous improvement. We believe the inclusion of an option payment to help offset customers costs for supporting voluntary curtailment will make the scheme fairer and more accessible.
- 8. Are there any new or additional Issues for the Modification Report:**
When considering the potential costs and risks associated with involuntary curtailment the overall financial value (£m) of this scheme seems low. We note National Grid have determined this value following engagement with relevant customers and therefore, if priced fairly, we would expect to see customers utilising the scheme.

It may be prudent to keep this value under review and ensure sufficient flexibility exists to review or amend depending on the utilisation of the service.

9. Self-Governance Statement Do you agree with the status?

Not Applicable

10. Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We **agree** with the proposer that this modification is positive in respect of Relevant Objective(s) **(a) and (b)**

11. Impacts & Costs:

What analysis, development and on-going costs would you face if this modification was implemented?

We **have not** identified any significant costs associated with the implementation of this modification

12. Implementation:

What lead times would you wish to see prior to this modification being implemented, and why?

As soon as possible

13. Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

We have not reviewed the Legal Text provided.

14. Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or you wish to emphasise.

No