

Representation - Draft Modification Report UNC 0822 Reform of Gas Demand Side Response Arrangements

Responses invited by: 5pm on 22 September 2022

To: enquiries@gasgovernance.co.uk

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

Representative:	Louise Hellyer
Organisation:	TotalEnergies Gas & Power
Date of Representation:	22/09/22
Support or oppose implementation?	Support/Oppose/Qualified Support/Comments * <i>delete as appropriate</i>
Relevant Objective:	<p>a) Positive/Negative/None * <i>delete as appropriate</i></p> <p>b) Positive/Negative/None * <i>delete as appropriate</i></p>
Relevant Charging Methodology Objective:	Not Applicable

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

- It is advantageous for customers to have more certainty on revenue to help with participating in DSR as they may well need to invest in additional systems and or back up fuels.
- The one hour bid window is tight with multiple parties involved, possibly this is something that could be investigated in future when a little more time is available to see if tri party set up is required.
- This change should be positive to DSR and with the current situations that feels the right thing to do although it does add additional risk and complexity for Shippers.

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

As soon as possible

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

N/A

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

Not reviewed

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