

Representation - Draft Modification Report UNC 0856

Introduction of Trials for Non-Daily Metered (NDM) Demand Side Response (DSR)

Responses invited by: **5pm on 04 December 2023**

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 and Southern Gas Networks Ltd
Date of Representation:	4 th December 2023
Support or oppose implementation?	Qualified Support
Relevant Objective:	<p>a) Positive</p> <p>b) Positive</p> <p>f) Positive</p>
Relevant Charging Methodology Objective:	Not Applicable

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

SGN would like to offer qualified support in response to this modification consultation. SGN can see the merit of this modification as it will introduce a process that will enable National Gas Transmission to run limited time trials for Non-Daily Metered Demand Side Response that will then be subject to consultation and an Ofgem direction before potentially being implemented. Our qualified support is subject to future trials being rigorously considered and any consequential impacts being fully understood so that informed decisions are taken. We would strongly encourage the proposer to ensure that trials are fully communicated to industry parties and end consumers who may be involved in the process as this will no doubt impact the success of any trials.

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

The modification should be implemented as soon as practical following an authority determination.

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

SGN has not identified any costs resulting from the implementation of this modification, however we may be impacted by the trials that are undertaken however this would have to be assessed on a case-by-case basis.

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

SGN is satisfied that the legal text will facilitate the intent of the solution in 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.*

No identified.

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

None identified.