

Representation – Draft Modification Report UNC 0861S

Clarification of Provisions Regarding Utilisation of the System Without Holding System Capacity

Responses invited by: 5pm on 07 March 2024

To: enquiries@gasgovernance.co.uk

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

Representative:	Phil Lucas
Organisation:	National Gas Transmission
Date of Representation:	6 th March 2024
Support or oppose implementation?	Support
Relevant Objective:	d) Positive
Relevant Charging Methodology Objective:	Not Applicable

Reason for support/opposition:

As the Proposer, National Gas Transmission (NGT) supports implementation of this Proposal as it would enhance the clarity of the UNC regarding the interaction between terms relating to the Use of System and the extent of relevant Transporters obligations in respect of deliveries to, and offtake from, the Total System. On this basis, implementation would remove any ambiguity that has been identified by stakeholders (as set out in the Proposal) which will better facilitate the securing of effective competition between relevant Shippers.

Governance Statement:

We continue to believe that, as set out in our Proposal, application of Self-Governance procedures is appropriate as the changes proposed are unlikely to have a material effect. This is because the solution merely seeks to enhance clarity and transparency in the UNC regarding the interaction between the two areas identified above and therefore do not *change* any aspects of the market arrangements.

Impacts and Costs:

There are no impacts nor costs associated with implementation.

Implementation:

There is no lead time required for implementation hence as Self-Governance procedures

are applicable, hence implementation can be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

Legal Text:

We are satisfied that the legal text delivers the intent of the solution.

Panel Questions:

None raised.

Error or Omissions:

We have not identified any such errors or omissions.

Additional analysis:

Not applicable.