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Pamela Taylor
Associate Partner
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Dear Pamela,

Open letter: Change of the Gas Day

We welcome the opportunity to offer our views on how the shift to a 5:00 to 5:00 UCT gas day could impact the GB system. We recognise that this shift will be necessary given the definition of 'gas day' in the EU Network Codes. The change will have a significant impact on the GB system, in terms of the timing of processes, contractual arrangements and stakeholders' internal systems.

Implementation date

We would first like to express our preference for an implementation date that coincides with the start of the gas year, i.e. on 1 October 2015. This would make it less cumbersome to manage changes to contractual arrangements.

A fixed date would further allow stakeholders to start laying out the steps that will be needed to implement the change within their organisations. Our preference is therefore that a date for the shift is set as soon as possible.

Changes to system processes

We recognise that National Grid have begun an assessment of the impacts that the shift will have on system processes and have shared the progress of that assessment with stakeholders.

We anticipate that the shift could impact areas such as deadlines for demand forecasts, capacity deadlines, nomination deadlines, outage deadlines, OCM deadlines and more. The consequent



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changes that system users will need to make to IT systems, internal processes and to contractual arrangements will be significant.

In light of this impact, it would be beneficial for system users to receive clarity on the detailed changes to deadlines and processes as soon as possible, as this would allow users to start planning the steps that will be needed to implement the change.

Impact on traded volumes

As a last point, we also note that shifting the start of the gas day to an early morning hour could in practice lead to that limited volumes are traded at the very start of the gas day. That is, an hour of trading is "lost".

Overall, the impact of the shift of the gas day will have a system wide impact and will require a coordinated approach across industry. We therefore welcome the chance to offer our input at this stage.

Please do not hesitate to contact us to discuss any of the above points in greater detail.

Yours sincerely,



Sofia Eng

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