

SEFE Energy Representation Draft Modification Report

Modification 0819 - Establishing/Amending a Gas Vacant Site Process

1. **Consultation close out date:** 16th November 2023
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:**
SEFE Energy
5th Floor
8 First Street
Manchester
M15 4RP
4. **Representative:**
Steve Mulinganie
Regulation Manager
stevemulinganie@sefe-energy.com
0799 097 2568
5. **Date of Representation:** 16th November 2023
6. **Do you support or oppose Implementation:**
We **Support** implementation of this Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
This Modification gives Shippers the ability to more efficiently manage Settlement Performance Obligations and reduce Transportation Costs for relevant Vacant sites
8. **Are there any new or additional Issues for the Modification Report:**
No
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 proper that this Modification is **positive in respect of relevant objective [d]** it will ensure that Shippers are not paying unnecessary costs.

11. Consumer Benefits:

Do you have any comments on the Consumer Benefits?

We believe the Modification is positive as the proposed process will likely see increased visits to Vacant sites to monitor and establish if sites are still in a Vacant state with no access

12. 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

13. Implementation:

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

We would expect the modification to be **implemented as soon as reasonably practicable** following a decision. We believe more certainty on the actual delivery dates for Modifications should be given to set expectations and avoid unreasonable delays between a decision being made by the Authority and the implementation of the Modification. As we have seen recently with other proposals some changes that have received Authority Direction have had excessively long implementation timelines which in some cases have ultimately led them to become redundant.

14. Legal Text:

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

We note that the **workgroup has considered the Legal Text and Commentary and is satisfied** that it meets the intent of the Solution

15. Modification Panel Questions:

Do you have any comments on any questions raised by the Modification Panel?

We note the Workgroup response and have **no further comments**

16. Performance Assurance Considerations:

Do you have any comments?

It is recognised that the Modification will require additional reporting in the PARR regarding the vacant sites process. PAC and that PAC has been actively discussing the nature of those reports

17. 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