

Representation

Draft Modification Report

0450 0450A 0450B - Monthly revision of erroneous SSP AQs outside the User AQ Review Period

Consultation close out date: 12 December 2013

Respond to: enquiries@gasgovernance.co.uk

Organisation: DONG Energy Sales UK

Representative: Lorna Lewin

Date of Representation: 12 December 2013

Do you support or oppose implementation?

0450 - Qualified Support

0450A - Not in Support

0450B - Support

If either 0450, 0450A or 0450B were to be implemented, which would be your preference?

Prefer 0450B

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

We agree with the original intent of modification 0450 as the inability to amend erroneous AQs during the AQ Amendment window affects all shippers. The ability to amend erroneous SSP AQs outside of the user AQ Review Period will help alleviate the impacts of inaccurate charges, gas purchase costs and credit requirements which can be significant for smaller shippers.

We believe 0450B delivers the original intent of 0450 by applying an appropriate calculation to allocate the number of monthly appeals to Shippers.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

No

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

The ability to amend erroneous SSP AQs will lead to improved allocation costs and will improve the accuracy of AQs. This will have a positive impact on competition in the market and therefore meets relevant objective (d).

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

If 0450 is implemented we would expect minimal system impacts.

Implementation:

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

Project Nexus Rolling AQ provides the solution going forward, therefore early implementation is desirable to enable shippers to take maximum advantage.

Legal Text:

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

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

No
