

Representation

Draft Modification Report UNC 0648S: End dating the revised DM Read estimation process introduced by Modification 0634

Modification Report

- 1. Consultation close out date:** 27th April 2018
- 2. Respond to:** enquiries@gasgovernance.co.uk
- 3. Organisation:** Gazprom Energy
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1 Tony Wilson Place
First Street
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- 4. Representative:** Steve Mulinganie
Regulation Manager
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0799 097 2568
- 5. Date of Representation:** 11th April 2018
- 6. Do you support or oppose Implementation:**
We **Support** implementation of Modification 0648S
- 7. Please summarise (in 1 paragraph) the key reason(s) for your position:**
We raised Modification 0648S as operational experience of Modification 0634 clearly demonstrated that the proposal was largely ineffective and indeed to avoid detriment relied on Xoserve operating in a pragmatic fashion and not explicitly in line with the business rules in Code.

The Workgroup also noted:

The Workgroup believe it would be beneficial to remove the obligations on the CDSP to manage this process as it is inconsistent with the principles adopted on the implementation of Modification 0565A - Central Data Service Provider: General framework and obligations and the removal of the use of the CDSP discretion in the provision of services."

8. Are there any new or additional Issues for the Modification Report:

No

9. Self-Governance Statement Do you agree with the status?

Yes

10. Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We **agree** that this modification is positive in respect of Relevant Objective (f). This modification should remove the inherent inefficiency of the obligation on the CDSP to assess such consumptions, and allow the Shipper Users and the DMSP (on the Transporter's behalf) to engage with each other directly and determine the most appropriate course of action. In addition, by removing the process introduced by Modification 0634 (Urgent), it will also remove the ambiguity between the business rules set out in Code and those actually operated by the CDSP.

11. 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 this modification

12. Implementation:

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

As soon as practicable

13. Legal Text:

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

We have **no** comments on the Legal Text provided.

14. 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