

Representation

Draft Modification Report

UNC 0711S: Update of AUG Table to reflect new EUC bands

1. **Consultation close out date:** 12th March 2020
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:** Gazprom Energy
5th Floor
8 First Street
Manchester
M15 4RP
4. **Representative:** Steve Mulinganie
Regulation Manager
stevemulinganie@gazprom-mt.com
0799 097 2568 / 0751 799 8178
5. **Date of Representation:** 10th March 2020
6. **Do you support or oppose Implementation:**
We **Support** implementation of the modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
We raised modification 711S to address the miss alignment between the AUG table format implemented as part of project NEXUS and the subsequent amendments that have been made to EUC Bands 1 which have each been split into four new categories by Change Proposal XRN4665 Creation of New End User Categories.
8. **Are there any new or additional Issues for the Modification Report:**
No
9. **Self-Governance Statement Do you agree with the status?**
Yes – we believe the change to be minor in nature and with the implementation date now being October 2021 substantial advance notice is provided thus mitigating any material concerns

10. Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We believe that this modification is **positive in respect of Relevant Objective (d)** as the update to the AUG Table to align the new End User Categories in place will allow the AUGC to provide Allocation Adjustments Factors for those new End User Categories as it sees fit. This should improve the accuracy of UIG allocation and place costs into the markets sectors where they occur. Better cost reflectivity allows costs to be placed where they are incurred and the increased level of granularity should provide better cost discovery for all market participants, and so further competition between relevant shippers and suppliers

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?

We note the proposed implementation date is October 2021 thus providing adequate notice of the change

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