

**Representation For. 0081**  
"AQ Review Process - publication of information "  
Version 1.0

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**Slant:** For  
**Strictly Confidential:** No

**Abstract**

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Mod 0081 AQ Review Process - publication of information

Dear Julian,

Thank you for the opportunity to respond on Mod 0081. We support this Modification as well as the principal of greater transparency in the AQ Review process.

There have been a number of occasions over recent years when there has suspicion and rumour about inappropriate behaviour by a Shipper seeking to gain unfair advantage through manipulation of the AQ Review process. Despite no official sanction having ever been publicly imposed there is still the concern that some Shippers are "getting away with it".

We believe that as the industry matures it should the role of the industry participants to monitor each others behaviour with sufficiently clear and transparent data that should deter anyone from abusing the system. This mod does not seek to describe what the Transporters and Users could or should do if

abuse is suspected and this should be left until the effect of this mod (if approved) is tested. In the interim as the data will be attributed anonymously Users may expect the Regulator to act more openly in dealing with cases of suspected abuse.

We sympathise with Transporters concerns about the confidentiality of the data and concur with them that the use of a Shipper A, Shipper B system should suffice.

I would be happy to discuss any of the issues raised with you.

Yours sincerely,

Simon Howe.  
Gas Network Codes Manager