

Representation

Draft Modification Report

0282 / 0282A: Introduction of a process to manage Vacant sites

Consultation close out date: 03 June 2011

Respond to: enquiries@gasgovernance.co.uk

Organisation: Scottish and Southern Energy Ltd

Representative: Mark Jones

Date of Representation: 03 June 2011

Do you support or oppose implementation?

0282 - Qualified Support

0282A - Qualified Support

If either 0282 or 0282A were to be implemented, which would be your preference?

Prefer 00282A

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

We support the intent of both proposals as they could both lead to improved accuracy of charging and gas allocation if used properly. However, we believe that the audit processes are not as tight as they could be, and are certainly not as tight as those contained within the electricity vacant sites process on which these two proposals were based. These modifications will also, to some extent, reduce the incentives for shippers to isolate supplies, which in turn could lead to safety issues.

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?

We agree with the proposer that it will facilitate relevant objectives (d) and (f)

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Version 1.0

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Impacts and Costs:

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

Not known.

Implementation:

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

In line with the timescales put forward in the ROM.

Demand Information:

Please provide demand information to enable finalisation of the ACS.

Legal and ACS (Agency Charging Statement) Text:

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

Yes

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