

## Representation

### Draft Modification Report

#### 0331: Demand Estimation Section H Changes to Processes and Responsibilities

**Consultation close out date:** 05 September 2011  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** SSE  
**Representative:** Mo Rezvani  
**Date of Representation:** 05 September 2011

#### Do you support or oppose implementation?

Support

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

Over years the change in the gas market structure has meant that many systems and processes have been unable to meet the need of many industry participants, in particular, shippers' concern about ineffective consultation process around profile estimation and analysis with significant impact on their businesses. This MOD will facilitate the delivery of a more equitable process to all industry participants and allows them to participate in improving the entire process using their expertise.

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

Under the "DESC Members and Appointment" another requirement should be added: f) Xsoserve is required to state, when they have subcontracted the analysis out to a third party and allow the third party to be available to answer queries and give any clarification as appropriate to the DESC/Expert Group.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

This MOD would facilitates the implementation of objectives A11.1 (d) and A11.1 (f) i)by enabling better allocation hence reducing reconciliation risk and promoting competition.

ii) The process transparency would lead to better verification of profiles on a fair and non –discriminatory basis hence promoting efficiency.

**Impacts and Costs:**

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

As a NDM shipper, we will share any additional cost over above the current cost to the Transporters.

**Implementation:**

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

There is no lead time necessary for the implementation of this MOD.

**Legal Text:**

*Are you satisfied that the legal 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.