

Representation

Draft Modification Report

0335: Offtake Metering Error – Payment Timescales

and

0335A: Significant Offtake Metering Error – Small Shipper Payment Timescales

Consultation close out date: 02 December 2011

Respond to: enquiries@gasgovernance.co.uk

Organisation: First Utility

Representative: Chris Hill

Date of Representation: 01 December 2011

Do you support or oppose implementation?

0335 - Support

0335A - Support

If either 0335 or 0335A were to be implemented, which would be your preference?

Prefer 0335

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

The implementation of either Proposed Modification would provide a strong incentive for Transporters to guarantee the accuracy of their shrinkage calculations and facilitate effective competition between shippers and suppliers as these parties would not continue to face the risk of having to repay their share of unallocated gas for significant errors over a short space of time.

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

No.

Relevant Objectives:

How would implementation of these modifications impact the relevant objectives?

0335/0335A
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Version 1.0

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Implementation of either Proposed Modification would assist in the furtherance of Relevant Objectives d) i) and ii) (securing of effective competition between relevant shippers and suppliers).

Impacts and Costs:

What analysis, development and ongoing costs would you face if these modifications were implemented?

We would not face any costs as a result of implementation of either of these Proposed Modifications and would benefit from reduction of the current potential impact on cashflow relating to this issue.

Implementation:

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

We would like to see implementation as soon as the Authority considers reasonably practicable.

Legal Text:

Are you satisfied that the legal text will deliver the intent of each 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.