

Representation

Draft Modification Report

0338V: Remove the UNC requirement for a 'gas trader' User to hold a Gas Shipper Licence

Consultation close out date: 30 March 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: **Wales & West Utilities**
Representative: Robert Cameron-Higgs
Date of Representation: 29 March 2012

Do you support or oppose implementation?

Comments

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

The principle concern WWU have with this proposal is the two tier compliance regime it will necessarily introduce for those Users who hold a Shipper Licence and those who under this proposal do not.

We note the comments offered at Workgroups and in representations which confirm a reluctance and nervousness that this proposal if implemented may carry unintended consequences.

We are therefore unsure if this proposal correctly balances the efforts to facilitate competition between certain User categories, and the knock on effect of operating the administration and implementation of the UNC which would need to accommodate this new type of Code signatory.

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

No

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20 February 2012

Version 1.0

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Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Impacts and Costs:

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

Implementation:

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

Legal Text:

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

We have not considered the legal text in our assessment of this proposal

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