

Representation

Draft Modification Report

0343 - The ability and requirement for Users and Transporters to raise issues to be considered by the Allocation of Unidentified Gas Expert as "known" issues

Consultation close out date: 08 July 2011

Respond to: enquiries@gasgovernance.co.uk

Organisation: Scottish and Southern Energy Ltd

Representative: Mark Jones

Date of Representation: 08 July 2011

Do you support or oppose implementation?

Comments

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

We believe that this modification is essentially doing two things and agree with the first, but have a concern with the second.

We are in agreement with the intent of the modification in that Transporters and Users should be able to bring issues directly to the attention of the AUGGE in the most efficient manner possible for inclusion in the AUG Methodology.

However, we have a concern in that we believe that the requirement on parties to bring forward issues that they believe are contributing to unidentified gas is unenforceable.

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?

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Version 1.0

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We agree with the Proposer in that this modification would better facilitate Relevant Objective A11.1(d) as this is achieved by the bringing to the attention of the AUGÉ issues affecting unidentified gas.

However, we do not agree that it would necessarily facilitate A11.1(f) as we do not believe that this aim of the modification could be enforced.

Impacts and Costs:

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

None

Implementation:

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

The modification could be implemented immediately after the Authority's decision.

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.