

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: Shell Gas Direct

Representative: Lisa Harris

Date of Representation: 08 July 2011

Do you support or oppose implementation?

Not in Support

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

Shell Gas Direct support the intent of the modification and agree that parties should have the ability to raise issues that would impact the AUGS directly with the AUGE, however we feel that this is already allowed for in the existing guidelines.

In relation to placing a requirement on parties to bring forward known issues that they believe are contributing to unidentified gas, we cannot see how this could be monitored or enforced. We do not see how it could be proved that a party knew about an issue but did not raise it with the AUGE and therefore for this reason, we do not support including obligations in the UNC.

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

We have not identified any issues.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We do not feel that this modification meets relevant objection F (promotion of efficiency in the implementation and administration of the network code) as we cannot see how the code obligations would be enforced.

Impacts and Costs:

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

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We do not feel that significant development costs would apply if the mod were implemented.

SGD agree that the ongoing costs faced by the AUGE could increase if large volumes (of potentially irrelevant information) were to be submitted to the AUGE as parties try to comply with their obligations.

Implementation:

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

We do not feel that a lead time would be necessary following a decision to implement this modification.

Legal Text:

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

The legal text reflects the intent of the modification.

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 further comments.