

## Stage 04: Final Modification Report

What stage is this document in the process?

# 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



It is proposed that all Users and Transporters, who are signatories to the Uniform Network Code;

1. Have the ability to raise issues directly with the AUGC for assessment and inclusion within the AUG Methodology and AUG Table and
2. Places a requirement on parties to bring forward issues that they believe are contributing to unidentified gas.

This ability and requirement would warrant that Users and Transporters provide information on issues they believe to be contributing to the unidentified gas problem and an assessment, if available, of the scale of the issue. In addition if the User/Transporter has a view or information available regarding how much of the issue is or could be attributable to the LSP market, or indeed the share between the markets, this too should be made available.



Panel did not determine to recommend that Modification 0330 should be implemented



High Impact: UNC signatories

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## About this document:

This document is a Final Modification Report, presented to the Panel on 21 July 2011. The Authority will consider the Panel's Recommendation and decide whether or not this change should be made.



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# 1 Summary

## Is this a Self-Governance Modification

Not Applicable.

## Why Change?

ScottishPower is concerned that the AUGE will be expected to identify which elements of the gas allocation process and market arrangements, are to be deemed “known issues”. In particular this concern relates to whether the AUGE will have the appropriate insight and experience to be able to determine these issues and also the understanding of what is believed to contribute to the unidentified gas issue. They do understand that Transporters and Users are required to cooperate and provide data to the AUGE in the preparation of the AUG Table. However the current drafting of the UNC is not explicit in the ability of signatories to the Uniform Network Code to bring issues to the attention of the AUGE for subsequent inclusion within the AUG Methodology and Table.

## Solution

It is proposed that all Users and Transporters, who are signatories to the Uniform Network Code;

1. Have the ability to raise issues directly with the AUGE for assessment and inclusion within the AUG Methodology and AUG Table and
2. Places a requirement on parties to bring forward issues that they believe are contributing to unidentified gas.

This ability and requirement would warrant that Users and Transporters provide information on issues they believe to be contributing to the unidentified gas problem and an assessment, if available, of the scale of the issue. In addition if the User/Transporter has a view or information available regarding how much of the issue is or could be attributable to the LSP market, or indeed the share between the markets, this too should be made available.

The specific form of the information to be provided to the AUGE would be determined by the AUGE once appointed, but it is envisaged that there would be a standard form to be completed and submitted to the AUGE, where the User/Transporter has identified a “known issue”.

This approach will ensure that the party appointed to carry out the AUGE role can utilise cross-industry experience and understanding of the AUGE issue and addresses the concern that the AUGE might not have the appropriate insight and experience to effectively determine the issues contributing to unidentified gas. In addition it will require Users and Transporters to raise awareness of issues that they know are playing into the unidentified gas volumes.

ScottishPower believes this approach will ensure that Users, who are subject to the costs of unidentified gas can raise issues that they believe are inappropriately allocating costs to their business. It will also allow Transporters the opportunity to put forward areas for consideration, which they understand to be feeding into unidentified gas.

If the proposal were not accepted, then there is a real concern that the AUGE will spend valuable time in trying to understand and identify issues contributing to the unidentified gas, when the Users affected by the issues already have an acute

understanding of some of the issues and the Transporters also have ideas of issues.

The specific form of the information to be provided to the AUGE would be determined by the AUGE once appointed, but it is envisaged that there would be a standard form to be completed and submitted to the AUGE, where the User/Transporter has identified a "known issue".

## Impacts & Costs

This proposal would be embedded in the introduction of MOD229 functionality. It is not envisaged that it would contribute further costs to the industry, but instead aid and simplify the process for the AUGE to identify "known issues".

## Implementation

It is proposed that this modification is introduced at the same time as the appointment of the AUGE and that Transporters and Users should have the ability and requirement from commencement of the contract with the AUGE to raise issues with them.

## The Case for Change

This modification proposal would better facilitate the following Relevant Objectives:

**Standard Special Condition A11.1 (d): so far as is consistent with subparagraphs (a) to (c) the securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers.**

This proposal would ensure more accurate allocation of costs by giving Users the opportunity to raise "known issues" and ensure that the AUGE is in a position to quickly recognise issues that the industry already know are playing into unidentified gas and perform reallocation against the agreed methodology. It would also allow Transporters and Users to raise issues to be considered "known issues" on an on going basis as they further understand the unidentified gas issue.

In addition by putting in place a process and a standard form for raising issues, the AUGE will have a transparent record of issues that it should consider and also be able to demonstrate that these are being managed.

**Standard Special Condition A11.1 (f): So far as is consistent with subparagraphs (a) to (e) the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code.**

This proposal seeks to ensure the framework being introduced under MOD229 is complete in relation to ensuring costs of unidentified gas are appropriately associated and distributed to the correct market sector. This Proposal will allow UNC signatories the ability to raise issues directly with the AUGE. Where available they can provide supporting information and data to assist the AUGE in the establishment of the AUG Methodology and AUG Table.

## Recommendations

The Panel is invited to consider the Final Modification Report.

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## 2 Why Change?

Under the recently accepted modification 0229 the Allocation of Unidentified Gas Expert (AUGE) will be appointed to create a methodology to apportion known issues between the SSP and LSP market and rectify the current cross-subsidy where the SSP market is picking up costs associated with the LSP market. Such cross subsidy is enacted through the Reconciliation by Difference process. At the present time a process has commenced to create a tender exercise for the appointment of the AUGE, although the process of appointment is now not expected to be concluded until after 1<sup>st</sup> April 2011 (information provided in Mod 339/340). Once the expert is appointed it will create a methodology for the allocation of unidentified gas and look for issues, to become named "known issues" to be assessed and factored through the methodology. The UNC Committee will arrange for consultation on the AUG Methodology. Once established an AUG Table will be proposed and this will be used as the basis for "known issues" to be reallocated through the invoicing processes.

ScottishPower is concerned that the AUGE will be expected to identify which elements of the gas allocation process and market arrangements, are to be deemed "known issues". In particular this concern relates to whether the AUGE will have the appropriate insight and experience to be able to determine these issues and also the understanding of what is believed to contribute to the unidentified gas issue. We do understand that Transporters and Users are required to cooperate and provide data to the AUGE in the preparation of the AUG Table. However the current drafting of the UNC is not explicit in the ability of signatories to the Uniform Network Code to bring issues to the attention of the AUGE for subsequent inclusion within the AUG Methodology and Table.

## 3 Solution

### Proposal

It is proposed that all Users and Transporters, who are signatories to the Uniform Network Code;

1. Have the ability to raise issues directly with the AUGÉ for assessment and inclusion within the AUG Methodology and AUG Table and
2. Places a requirement on parties to bring forward issues that they believe are contributing to unidentified gas.

This ability and requirement would warrant that Users and Transporters provide information on issues they believe to be contributing to the unidentified gas problem and an assessment, if available, of the scale of the issue. In addition if the User/Transporter has a view or information available regarding how much of the issue is or could be attributable to the LSP market, or indeed the share between the markets, this too should be made available.

The specific form of the information to be provided to the AUGÉ would be determined by the AUGÉ once appointed, but it is envisaged that there would be a standard form to be completed and submitted to the AUGÉ, where the User/Transporter has identified a "known issue".

This approach will ensure that the party appointed to carry out the AUGÉ role can utilise cross-industry experience and understanding of the AUGÉ issue and addresses the concern that the AUGÉ might not have the appropriate insight and experience to effectively determine the issues contributing to unidentified gas. In addition it will require Users and Transporters to raise awareness of issues that they know are playing into the unidentified gas volumes.

ScottishPower believes this approach will ensure that Users, who are subject to the costs of unidentified gas can raise issues that they believe are inappropriately allocating costs to their business. It will also allow Transporters the opportunity to put forward areas for consideration, which they understand to be feeding into unidentified gas.

If the proposal were not accepted, then there is a real concern that the AUGÉ will spend valuable time in trying to understand and identify issues contributing to the unidentified gas, when the Users affected by the issues already have an acute understanding of some of the issues and the Transporters also have ideas of issues.

## 4 Relevant Objectives

Implementation will better facilitate the achievement of **Relevant Objectives d and f.**

The benefits against the Code Relevant Objectives	
Description of Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	N/A
b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.	N/A
c) Efficient discharge of the licensee's obligations.	N/A
d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	Yes
e) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers.	N/A
f) Promotion of efficiency in the implementation and administration of the Code	Yes

This modification proposal would better facilitate the following Relevant Objectives:

**Standard Special Condition A11.1 (d): so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers.**

This modification could ensure more accurate allocation of costs by giving Users the opportunity to raise "known issues" and ensure that the AUGÉ is in a position to quickly recognise issues that the industry already know are playing into unidentified gas and perform reallocation against the agreed methodology. It would also allow Transporters and Users to raise issues to be considered "known issues" on an on going basis as they further understand the unidentified gas issue.

In addition by putting in place a process and a standard form for raising issues, the AUGÉ will have a transparent record of issues that it should consider and also be able to demonstrate that these are being managed.

The modification obligates parties to provide issues to the AUGÉ and not be specific in their submissions by omitting issues.

British Gas consider this Modification Proposal will encourage more information to be provided to the AUGE and thus improve the accuracy of the eventual methodology. This in turn will lead to a more accurate reallocation of gas costs in the market and therefore increase the degree to which Shippers are able to fairly compete with each other. To this extent they believe that this Modification Proposal facilitates relevant objective (d).

Corona Energy considers this modification does nothing to usefully increase the opportunity for shippers and suppliers to inform the AUGE of issues as the current process already allows this to happen.

National Grid Distribution considers that the Modification Proposal permits Transporters and Users to raise issues with the AUGE on an on-going basis as the nature of Unidentified Gas is further understood and agree that this is consistent with the above objective.

ScottishPower considers this Modification should ensure parties do not exclude any issues they believe to be contributing to unidentified gas where they do not want them factored through the process because of the commercial consequences. Allowing as many known issues to factor through the process as possible will lead to a more accurate and timely allocation of the costs associated with unidentified gas across the market.

**Standard Special Condition A11.1 (f): So far as is consistent with subparagraphs (a) to (e) the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code.**

This modification seeks to ensure the framework being introduced under MOD229 is complete in relation to ensuring costs of unidentified gas are appropriately associated and distributed to the correct market sector. This modification will allow UNC signatories the ability to raise issues directly with the AUGE. Where available they can provide supporting information and data to assist the AUGE in the establishment of the AUG Methodology and AUG Table.

Some workgroup members consider the topic of this modification should be managed through the AUGE guidelines and the modification detracts from the efficient administration of the UNC.

Corona Energy understands this Modification Proposal would oblige UNC signatories to bring forward 'issues' associated with Unidentified Gas. Their view is that this objective is not facilitated based on the lack of a means by which the relevant obligation can be monitored, validated and enforced in a reasonable and proportionate fashion.

Both Gazprom and Shell Gas Direct understands this Modification Proposal would oblige UNC signatories to bring forward "issues" associated with Unidentified Gas. They believe this objective is not facilitated based on the lack of a means by which the relevant obligation can be monitored, validated and enforced.

## 5 Impacts and Costs

### Costs

Indicative industry costs – User Pays

Not applicable

### Impacts

Impact on Transporters' Systems and Process

Transporters' System/Process	Potential impact
UK Link	<ul style="list-style-type: none"> <li>The Workgroup expects changes to UK Link to be extremely limited, if at all required since the proposal utilises the mechanism introduced by MOD229</li> </ul>
Operational Processes	<ul style="list-style-type: none"> <li>none</li> </ul>
User Pays implications	<ul style="list-style-type: none"> <li>This modification would be embedded in the introduction of MOD229 functionality. It is not envisaged that it would contribute further significant costs to the industry, but instead aid and simplify the process for the AUGÉ to identify "known issues".</li> </ul>

Impact on Users

Area of Users' business	Potential impact
Administrative and operational	<ul style="list-style-type: none"> <li>There may be a small cost to Users from the requirement to make the AUGÉ aware of issues that are playing into unidentified gas, however this cost is expected to be a small administrative cost and be particularly limited after the first year of the AUGÉ operation.</li> </ul>
Development, capital and operating costs	<ul style="list-style-type: none"> <li>No implications have been identified</li> </ul>
Contractual risks	<ul style="list-style-type: none"> <li>No implications have been identified</li> </ul>
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> <li>No implications have been identified</li> </ul>

**Where can I find details of the UNC Standards of Service?**

In the Revised FMR for Transco's Network Code Modification **0565 Transco Proposal for Revision of Network Code Standards of Service** at the following location:  
<http://www.gasgovernance.co.uk/sites/default/files/0565.zip>

Impact on Transporters	
Area of Transporters' business	Potential impact
System operation	<ul style="list-style-type: none"> <li>There may be a small cost to Transporters from the requirement to make the AUGGE aware of issues that are playing into unidentified gas, however this cost is expected to be a small administrative cost and be particularly limited after the first year of the AUGGE operation.</li> </ul>
Development, capital and operating costs	<ul style="list-style-type: none"> <li>No implications have been identified</li> </ul>
Recovery of costs	<ul style="list-style-type: none"> <li>No implications have been identified</li> </ul>
Price regulation	<ul style="list-style-type: none"> <li>No implications have been identified</li> </ul>
Contractual risks	<ul style="list-style-type: none"> <li>No implications have been identified</li> </ul>
Legislative, regulatory and contractual obligations and relationships	<ul style="list-style-type: none"> <li>No implications have been identified</li> </ul>
Standards of service	<ul style="list-style-type: none"> <li>No implications have been identified</li> </ul>

Impact on Code Administration	
Area of Code Administration	Potential impact
Modification Rules	<ul style="list-style-type: none"> <li>No implications have been identified</li> </ul>
UNC Committees	<ul style="list-style-type: none"> <li>No implications have been identified</li> </ul>
General administration	<ul style="list-style-type: none"> <li>No implications have been identified</li> </ul>

Impact on Code	
Code section	Potential impact
TPD Section E	

Impact on UNC Related Documents and Other Referenced Documents	
Related Document	Potential impact
Network Entry Agreement (TPD I1.3)	No implications have been identified
Network Exit Agreement (Including Connected System Exit Points) (TPD J1.5.4)	No implications have been identified

Impact on UNC Related Documents and Other Referenced Documents	
Storage Connection Agreement (TPD R1.3.1)	No implications have been identified
UK Link Manual (TPD U1.4)	No implications have been identified
Network Code Operations Reporting Manual (TPD V12)	No implications have been identified
Network Code Validation Rules (TPD V12)	No implications have been identified
ECQ Methodology (TPD V12)	No implications have been identified
Measurement Error Notification Guidelines (TPD V12)	No implications have been identified
Energy Balancing Credit Rules (TPD X2.1)	No implications have been identified
Uniform Network Code Standards of Service (Various)	No implications have been identified

Impact on Core Industry Documents and other documents	
Document	Potential impact
Safety Case or other document under Gas Safety (Management) Regulations	No implications have been identified
Gas Transporter Licence	No implications have been identified

Other Impacts	
Item impacted	Potential impact
Security of Supply	No implications have been identified
Operation of the Total System	No implications have been identified
Industry fragmentation	No implications have been identified
Terminal operators, consumers, connected system operators, suppliers, producers and other non code parties	No additional implications have been identified other than those previously highlighted under Mod 229.

## 6 Implementation

It is proposed that this modification is introduced at the same time as the appointment of the AUGE or as soon as possible following direction to implement, and that Transporters and Users should have the ability and requirement from commencement of the contract with the AUGE to raise issues with them.

## 7 The Case for Change

### Advantages

By placing a requirement on parties to bring forward issues that they are aware of, that may not have been discussed at industry, the AUGE process and assessment will make the most productive start possible in understanding the issues related to unidentified gas.

### Disadvantages

Currently there is no process in place to confirm if parties are complying with the modification and it is likely to be very difficult to regulate/monitor compliance with the modification.

The modification may result in parties submitting information that may not be relevant to ensure they are compliant with the modification. Some Workgroup members considered there might be a risk that relevant issues are missed by the AUGE due to the volume of issues submitted.

Some members consider that additional costs may be incurred due to the volume of issues raised by parties complying with their obligations to notify the AUGE of known issues.

## 8 Legal Text

Suggested legal text provided by National Grid Distribution:

### TPD Section E

Amend paragraph 10.4.3 as follows:

10.4.3 For the purposes of this paragraph 10.4, for each AUG Year:

- (a) the AUG Expert shall prepare a proposed AUG Methodology;
- (b) the Committee shall consult or arrange for consultation with Users and Transporters (and other persons) in respect of the proposed AUG Methodology, and as part of such consultation, Users and Transporters shall provide directly to the AUG Expert (in a form determined by the AUG Expert) any relevant information that they reasonably believe is causing or contributing to Unidentified Gas including, if available, the scale and allocation of such contribution to a particular SPC Class;
- (c) In addition to providing information as set out in paragraph (b) above, at any time Users and Transporters shall be obliged to provide directly to the AUG Expert (in a form determined by the AUG Expert) any relevant information that they reasonably believe is causing or contributing to Unidentified Gas including, if available, the scale and allocation of such contribution to a particular SPC Class;
- (d)(e) the outcome of any such consultation or any information provided to the AUG Expert pursuant to (c) above, shall be taken into account by the AUG Expert in preparing a further proposed AUG Methodology;
- (e)(d) such further steps or iterations (if any) as are set out in the Allocation of Unidentified Gas Document shall be taken in relation to the proposed AUG Methodology;
- (f)(e) the Committee shall decide upon, adopt and publish the AUG Methodology;
- (g)(f) the AUG Expert shall implement the AUG Methodology and prepare a proposed AUG Table taking into account any relevant information provided by Users and Transporters;
- (h)(g) such steps as are set out in the Allocation of Unidentified Gas Document shall be taken in relation to the proposed AUG Table, following which the AUG Expert shall submit a final AUG Table to the Committee;
- (i)(h) the Committee shall adopt the final AUG Table submitted by the AUG Expert under paragraph (g) unless by unanimous resolution the Committee determines:
  - (i) to revise such AUG Table and adopt the revised AUG Table; or
  - (iii) to require any further iteration of any steps as referred to in paragraph (g), in which case paragraph (g) (to that extent) and this paragraph (h) shall further apply;
- (j)(i) the Committee shall publish the AUG Table as adopted under paragraph (h);

all in accordance with and subject to and according to the timetable provided in the Allocation of Unidentified Gas Document.

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## 9 Consultation Responses

Representations were received from the following parties:

Respondent	
British Gas	Supports
Corona Energy	Not in support
Gazprom Marketing and Trading	Not in support
National Grid Distribution	Provided comments
ScottishPower	Supports
Shell Gas Direct	Not in support
SSE	Provided comments

Of the 7 representations received 2 supported implementation, 2 provided comments and 3 were not in support.

### Summary Comments

British Gas considers that Modification Proposal 0343 will act as a deterrent against any incentive on Shippers to withhold any information, which is detrimental to their interests and to that extent increase the accuracy of the eventual AUGE methodology. They do however accept the view expressed by some that assessing compliance with the requirements of this Proposal will, in practice, be difficult.

Corona Energy suggests that during the development of Modification 0229 process, the proposer deliberately made available opportunities for industry participants to raise issues with the AUGE. The AUGE was given the ability and opportunity to investigate the issues raised by participants and to compel UNC code parties to provide information on request. Therefore, the first element to the ScottishPower proposal appears superfluous.

Corona Energy are concerned that this Modification Proposal obliges parties to raise issues that 'they believe to be contributing to the unidentified gas problem and an assessment, if available, of the scale of the issue.' They are unclear how this obligation could ever be enforced and this could create a situation where UNC Users could theoretically be found in breach of licence based on another party's view of their beliefs, thoughts or knowledge.

Gazprom considers the introduction of an AUGE has involved the appointment of an independent industry Expert with powers to seek information into the issues relating to the allocation of unidentified gas. They believe the AUGE to be suitably knowledgeable of the issues and to be competent to carry out the role of AUGE and investigate issues and seek information as necessary to discard its obligations, noting that the AUGE has already proactively sought information from participants and the industry has proactively responded to calls for information.

Gazprom considers a process lead by the AUGE as the independent Expert is more appropriate than a process where participants lead the AUGE and therefore do not see the necessity or the benefit of this obligation being introduced within the UNC. It is also unclear how such an obligation could be monitored and enforced.

National Grid Distribution note that the Modification Proposal “obligates parties to provide issues to the AUGE and not be specific in their submissions by omitting issues” and considers this element of the Modification Proposal questionable. In their opinion is that it would be virtually impossible for any monitoring party to determine/validate whether a User or Transporter has become aware of any ‘issue’ which might appear to be of interest to the AUGE but has chosen not to raise it. Ultimately there is therefore a risk that a User in particular may elect to raise only ‘issues’, which it might deem that the AUGE would be likely to allocate energy costs in favour of that User’s preferred sub set of Supply Points; i.e. Smaller (SSP) or Larger (LSP). It is not obvious to National Grid Distribution how this lack of transparency can be overcome. Consequently there appears to be little merit in including this apparently unenforceable obligation within the UNC.

ScottishPower considers that including the explicit requirement on all Users and Transporters, who are signatories to the UNC, to bring forward issues they believe are contributing to unidentified gas, as well as introducing the ability to raise issues directly with the AUGE, for assessment and inclusion within the AUG Methodology and AUG Table will ensure awareness is raised of issues that are known to contribute to the unidentified gas volumes. This in turn will ensure the AUGE can utilise cross-industry experience and understanding of the AUGE issue to effectively determine the issues contributing to unidentified gas.

ScottishPower considers this is a straightforward Modification that simply ensures the Code is clear, and therefore Code Parties are clear, that there is a requirement to bring forward any issues known to be contributing to unidentified gas. They believe this expectation has always been implied through the introduction of the AUGE although, at present, this is not explicit in the UNC.

Shell Gas Direct are concerned how placing a requirement on parties to bring forward known issues, which they believe are contributing to unidentified gas, could be monitored or enforced. They do not see how it could be proved that a party knew about an issue but did not raise it with the AUGE.

SSE considers that the modification is essentially doing two things and agree with the first, but have a concern with the second. They 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 AUGE in the most efficient manner possible for inclusion in the AUG Methodology. However, they have a concern that the requirement on parties to bring forward issues that they believe are contributing to unidentified gas is unenforceable.

## 10 Panel Discussions

The Panel Chair summarised that the modification introduces to the UNC the right for all parties to raise issues directly with the AUGE for assessment and inclusion within the AUG Methodology. In addition, the modification obliges parties to bring forward issues that they believe are contributing to unidentified gas.

Panel members recognised that providing all available relevant information to the AUGE would be expected to lead to the best possible assessment of the appropriate allocation of unidentified gas. This would be expected to improve the allocation of costs between Shippers and, by improving cost reflectivity, would facilitate the development of effective competition. Some Members felt this would be particularly facilitated by implementation since there would be an explicit obligation to raise all known issues, providing an incentive not to be selective with the information provided. However, other Members felt that the ability to provide information to the AUGE is already available such that there would be no improvement in the information available to the AUGE as a result of implementing the modification - if no additional information is provided, there would be no impact on this relevant objective.

Members were concerned that compliance with the obligations would not be capable of being monitored or enforced. In particular, the obligation to bring forward issues known to the party and believed to influence unidentified gas implies a need to understand both what each User knows and believes. Introducing obligations that Users cannot comply with/demonstrate they are complying with, and which cannot be enforced, could be regarded as adversely impacting the relevant objective of promotion of efficiency in the implementation and administration of the Code.

With two out of a possible ten votes cast in favour, Panel Members did not determine to recommend that Modification 0343 should be implemented.

The benefits against the Code Relevant Objectives	
Description of Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	None
b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.	None
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	Positive
e) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply	None

security standards... are satisfied as respects the availability of gas to their domestic customers.	
f) Promotion of efficiency in the implementation and administration of the Code	Negative

## 11 Recommendations

Panel Members did not determine to recommend that Modification 0343 should be implemented