

## Representation

### Draft Modification Report

#### Modification 0352 – The Introduction of an Interruptible Reverse Flow service at Moffat Interconnector

**Consultation close out date:** 12<sup>th</sup> August 2011

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** Gazprom Marketing & Trading Retail (GMT&R)

**Representative:** Steve Mulinganie  
Regulation & Compliance Manager

**Date of Representation:** 12<sup>th</sup> August 2011

**Do you support or oppose implementation?**

**SUPPORT**

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

**Introducing a reverse flow service at Moffatt will help to further integrate markets, and facilitate greater market liquidity, thereby facilitating the securing of effective competition.**

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

**NO**

0XXX

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2011

Version 1.0

Page 1 of 2

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**Relevant Objectives:**

*How would implementation of this modification impact the relevant objectives?*

**Implementation would provide for greater competition between relevant Shippers and increase market liquidity by facilitating greater access to the GB market and potentially allowing additional supplies into the GB market**

**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?*

**Implementation of this modification is contingent upon the existing CSA being amended, which is subject to Irish governance processes. Implementation will therefore need to be as soon as possible following completion of the necessary amendments to the CSA.**

**Legal Text:**

*Are you satisfied that the suggested 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**