

Representation

Draft Modification Report

Modification 0367 - Interruptible to Firm – Supply Point Transition

Consultation close out date: 19th May 2011

Respond to: enquiries@gasgovernance.co.uk

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

Representative: Steve Mulinganie
Regulation & Compliance Manager

Date of Representation: 16th May 2011

Do you support or oppose implementation?

GMT&R support the proposal

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

This proposal facilitates a known forthcoming event

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?

Implementation will better facilitate the achievement of Relevant Objective f.

Impacts and Costs:

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

GMT&R will be required to manage the transition of Customers from Interruptible to Firm and also take into account the prohibition of certain SPA processes between 8th September and 19th October 2011.

Implementation:

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

As the modification is following Self Governance procedures, implementation will be 15 days following a decision to implement by the Modification Panel.

Legal Text:

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

No comment

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.

We would note that while Users will bear no direct costs they will be impacted by the proposed solution which prohibits certain SPA processes between 8th September and 19th October 2011.

In addition we note that GMT&R have raised Modification 0374 which looks to provide a transition soft landing for customers forced to change from Interruptible to Firm