

## Representation

### Draft Modification Report

#### 0378: Greater Transparency over AQ Appeal Performance

**Consultation close out date:** 06 January 2012  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** SSE  
**Representative:** Mark Jones  
**Date of Representation:** 06 January 2012

#### Do you support or oppose implementation?

Support

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

The AQ appeals process helps the allocation of significant amounts of energy and charges in the gas market. The existing reports around this process do not provide sufficient transparency to ensure that all market participants are operating in a fair and correct manner. These new reports would provide substantially more information on activity in the appeals process and would highlight any abnormal behaviour.

#### 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?*

We agree with the proposer that implementation of this modification would better facilitate relevant objectives (d) and (f). By improving the reporting around the AQ appeal process, shippers will be more confident that the process is not being misused, and will act as a deterrent to any shippers that may be not acting in a proper manner around the appeals process.

**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?*

As soon as possible so that the reports for the current gas year could be made available at the earliest opportunity.

**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.