

## 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:** Scotland & Southern Gas Networks (SGN)

**Representative:** David Mitchell

**Date of Representation:** 04 January 2012

#### Do you support or oppose implementation?

Support

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

SGN are in support of the Modification Proposal as it will give greater transparency over Shipper activity following the AQ review process. The current process does not provide any data on AQ appeals and as such there is no audit trail of appeals and subsequent changes that may have been applied to AQs therefore we feel that this modification adds value to the AQ review process.

SGN are however aware of the number of proposals raised in this area due to shipper concerns regarding AQ Review performance and do believe that a sustainable solution to address the root cause should be considered to provide the shipper community with the confidence that they require.

#### 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 of this modification will encourage parties involved in the AQ review process to provide accurate AQ data to the industry which will lead to improved allocation of energy costs. This will in turn better facilitate competition between shipper as per Relevant Objective (d) The implementation of this modification may also give greater transparency of the shippers role within the network as per Relevant Objective (f).

**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?*

None

**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