

Representation

Draft Modification Report

0387: Removal of Anonymity from Annual Quantity Appeal and Amendment Reports

Consultation close out date: 06 January 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: Consumer Focus
Representative: Richard Hall
Date of Representation: 7 December 2011

Do you support or oppose implementation?

Support

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

We are aware that some parties believe that the AQ amendment process is being misused, although we note that nothing has been proven in this regard. It is impractical for the regulator to monitor and enforce rules in all aspects of market functioning at any given time, and this creates value in creating regulatory regimes that include natural incentives for market participants to behave themselves. Transparent market operation and increased reputational regulation ('naming and shaming' / 'naming and faming') can play a part in delivering this – and we regard 387 as a small but prudent step in the right direction on both counts.

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 consider that objective (d) will be better facilitated through the creation of a effective deterrent against misuse of the AQ amendment and appeal processes. This should help to guarantee the cost reflectivity of settlement, thereby facilitating competition.

We also consider that objective (f) will be better facilitated as the deterrent effect created by transparency should increase incentives to comply with code provisions.

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.

Legal Text:

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

We are not aware of any reason to believe the legal text is deficient.

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.