

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: **Corona Energy**
Representative: Richard Street
Date of Representation: 06 January 2012

Do you support or oppose implementation?

Not in Support

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

The removal of anonymity from the Mod 0081 reports will result in some parties drawing conclusions on an individual party's behaviour based on a limited set of performance information, with no supporting context to explain the high level figures provided. This will substantially increase the risk of unwarranted accusations of inappropriate activities and may damage a party's reputation in the market.

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?

The information currently provided in the Mod 0081 reports do not demonstrate appropriate or inappropriate use of the current industry processes, being a high level summary of Shipper activities with no supporting context. An external organisation may draw erroneous conclusions from the information provided. This modification will therefore not achieve the objectives of the proposer and may lead to unwarranted accusations and reputational damage to organisations that are operating appropriately in the UNC. This modification therefore has the potential of damaging competition and so goes against objective (d).

It should also be noted that the publication of the information could (with the implementation of modification 387) reveal the commercial strategies of suppliers that change their portfolio size or position within the market. It is not clear how or why this would further competition.

Impacts and Costs:

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

This modification will significantly increase the risk of unwarranted concerns regarding Shipper activities being raised, which may result in reputational damage.

Implementation:

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

We have no comments on implementation timescales.

Legal Text:

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

We have not reviewed the legal text.

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.