

## 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:** **RWEnpower**  
**Representative:** Edward Hunter  
**Date of Representation:** 05 January 2012

#### **Do you support or oppose implementation?**

Support

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

RWEnpower view the AQ process as a collaborative effort between Shippers and Xoserve to ensure that gas volumes are as accurate as possible when calculated. Removal of anonymity from the reporting process may improve accuracy of Shippers' data given the transparency of the reporting process.

However RWEnpower does acknowledge that there is maybe a potential for spurious accusations regarding Shipper performance. Under the proposed modification any challenge would be better focussed and able to be resolved than would happen if anonymity was retained. In the future a performance assurance/escalation framework to support this could prevent potential damage to a Shipper's reputation.

#### **Are there any new or additional issues that you believe should be recorded in the Modification Report?**

None

#### **Relevant Objectives:**

*How would implementation of this modification impact the relevant objectives?*

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Removal of anonymity has the potential to focus Shippers on data quality therefore fulfils relevant objectives:

d) Securing of effective competition:

(i) between relevant shippers;

(ii) between relevant suppliers; and/or

(iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.

f) Promotion of efficiency in the implementation and administration of the Code

**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