

## 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:** 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.**

Under the existing Mod 81 reports it is possible to identify a number of shippers from their portfolio sizes and also the prevalence of number of meter points in each LDZ area. There is, therefore, an uneven situation where some shippers are afforded total anonymity, whilst others are not, in a process which has major cost implications for almost all shippers. Furthermore, by making the process transparent shippers would be less likely to behave in a manner which misuses the process resulting in increased costs being allocated to other shippers.

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

The main drivers behind this modification are that some shippers are not anonymous and also that the AQ Review process can be misused. We are concerned, however, that this modification should not act as a precedent for other industry reports where all shippers have anonymity. Making these reports transparent could have an effect on shippers' commercial confidentiality and weaken any differentiation shippers may have in certain areas.

**Relevant Objectives:**

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

We agree with the proposer that implementation of this modification would facilitate relevant objectives (d) and (f). By giving all shippers the same amount of information it ensures that all shippers are treated equally and also by naming shippers it will act as a deterrent to misuses of the process ensuring a more accurate allocation of gas and charges. This will result in more effective competition and better compliance with 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?*

It could be implemented as soon as possible.

**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.