

## 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:** **Scotland and Southern Gas Networks**  
**Representative:** David Mitchell  
**Date of Representation:** 04 January 2012

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

Comments

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

SGN would like to offer comments only in regards to this UNC Modification Proposal.

A number of modifications have been raised recently in regards to the AQ Review and Appeals processes due to concerns raised by shippers, so far however there has been no evidence of concerns of misuse found and so removing anonymity from reporting may be an excessive change at this point in time.

Some parties also believe that removal of anonymity from the AQ appeal and amendment reports may expose the smaller shippers / suppliers leaving them at risk of their data being used for competitive advantage by other parties.

#### **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 evidence that has been provided to date for implementing this modification leads us to believe that there will be neither a positive or negative impact on the relevant objectives that have been set.

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Version 1.0

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**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.*

We feel that UNC Modification Proposal 0378 will address many of the concerns that have been raised in support of this modification with regards to giving greater transparency to the AQ appeal process and so this proposal may be not be required