

Representation

Draft Modification Report

0399: Transparency of Theft Detection Performance

Consultation close out date: 02 March 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: Scotland & Southern Gas Networks

Representative: David Mitchell

Date of Representation: 02 March 2012

Do you support or oppose implementation?

Not in Support

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

Although SGN are supportive of the industry work being carried out to address the theft of gas situation we do feel that there are a number of issues with this modification.

Firstly there is a substantial amount of work being done by industry around theft of gas including the SPAA Code of Practice and the NRPS/SETS (awaiting Ofgem decision). Due to this we feel that this modification is premature and that reporting should be considered once the other work has been finalised to ensure that the reporting is reflective of industry practices. As the reporting is already in place for shippers, and will continue to be produced, there should not be an issue with waiting.

Secondly we feel that the modification is underdeveloped and more should be done to develop the reporting before requirements are placed in the UNC.

Consideration should also be given to whether this type of obligation is best placed in the UNC as the Code of Practice will sit under SPAA perhaps reporting of theft performance would be better suited under SPAA governance.

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

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Version 1.0

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None

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

As the reporting is already in place and will continue to be produced we do not feel that this modification does further enable competition between shippers under relevant objective d) at the present time and industry should await the other developments before taking this forward.

Impacts and Costs:

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

GDNs would need to further develop systems and processes in order to robustly report theft of gas statistics in the course of conveyance; therefore there we would need a development period before robust reports could be produced.

Implementation:

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

TBC

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