

Representation

Draft Modification Report

0399: Transparency of Theft Detection Performance

Consultation close out date: 02 March 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: **Wales & West Utilities**
Representative: Robert Cameron-Higgs
Date of Representation: 02 March 2012

Do you support or oppose implementation?

Support

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

A consistent set of reporting data will enhance the ability of all parties to validate theft assumptions in the GDNs Shrinkage methodology. The removal of anonymity from any reporting will provide greater transparency of GDN and Shipper performance, which may in turn lead to improved working practices through the sharing of best practice (from the best performing organisations).

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 absence of anonymity in the reporting will enable parties to benchmark their performance against other organisations.

Impacts and Costs:

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

No significant costs are anticipated if this modification were implemented

Implementation:

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

Sufficient lead time is required to ensure the full reporting suite described in the proposal can be met.

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