

## Representation

### Modification Proposal

#### 0411S: Removal of the Obligation to Publish Firm Gas Monitor from the UNC

**Consultation close out date:** 01 June 2012  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** British Gas Trading Limited  
**Representative:** Chris Wright  
**Date of Representation:** 23 May 2012

#### Do you support or oppose implementation?

Support

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

We agree with the proposer that it makes limited sense to have an obligation to publish a figure which is likely to be in excess of 100% of storage space – thereby indicating an immediate breach - remaining thus throughout the winter period. The publication of such a figure is likely to be misleading and cause undue or misguided concern.

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

The reasons given for withdrawing the obligation to publish this figure is that it would exceed 100% - and thereby give rise to an immediate breach – from the outset. This does beg the question: were new storage to be built, or were firm demand to fall to a point where a Firm Gas Monitor figure was less than 100%, would an obligation to publish this figure be worth re-introducing?

#### Relevant Objectives:

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

We agree that removing an obligation to publish the figure, which appears to serve no useful purpose, would seem to better facilitate efficient administration and implementation of the UNC.

0411S  
Representation

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23 May 2012

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Version 1.0

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Page 1 of 2

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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?*

Immediate upon direction.

**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.