

Representation

Modification Proposal

0414S - Discontinuation of ANS usage for Interruption Communications by Transporters

Consultation close out date: 11 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 that there is no reason to continue with the provision of this service if it is not valued or utilised by shippers and, as far as can be ascertained, has no reasonable prospect of being required by shippers in future.

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

With hindsight, since cost is cited as the main reason for withdrawing the service, it might have been helpful to respondents if a figure had been provided for the expected savings to DNOs. It may then have been easier to arrive at a reasoned decision about the benefits of withdrawing the service, vs the risks (e.g. that it will be required in future).

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

It would appear to better facilitate efficient discharge of the licensees obligations to remove a costly yet redundant method of communication.

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.