

Representation

Draft Modification Report

0416S: Extending the data provision permissions created by Modification 0279 regarding historic asset and read data provision

Consultation close out date: 07 September 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: **Scotia Gas Networks**
Representative: David Mitchell
Date of Representation: 06 September 2012

Do you support or oppose implementation?

Support

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

SGN supports this modification proposal as it will better facilitate the resolution of data issues that may currently be experienced by Shippers when acquiring new sites. We believe that the provision of historic asset and read information will improve the AQ review process.

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

None

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

SGN agrees that this modification meets the self-governance criteria.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

The relevant objectives of this modification will be achieved as this modification will allow incoming shippers to have access to a full twelve months of meter read history. This will enable them to carry out a more thorough review of the AQ that they are holding which will facilitate a level playing field between shippers and hence improved competition. We agree that this modification will give shippers greater ability to carry out UNC processes and validation with the most accurate data.

Impacts and Costs:

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

SGN wouldn't be impacted by any costs should this modification be implemented.

Implementation:

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

The proposed modification implementation lead time gives sufficient time for this modification to be implemented

Legal Text:

Are you satisfied that the legal text [and the proposed ACS (see www.gasgovernance.co.uk/proposedACS)] will deliver the intent of the modification?

We are satisfied that the legal text delivers the intent of the modification.

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.

There is no other information that we feel should be considered.