

Representation

Draft Modification Report

Modification 0420: New Connections Interruptible loads

Consultation close out date: 7th September 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: Gazprom Marketing & Trading Retail
(GMT&R) trading as Gazprom Energy

Representative: Steve Mulinganie
Regulation & Compliance Manager

Date of Representation: 7th September 2012

Do you support or oppose implementation?

Qualified Support

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

While we support the aspirations behind the proposal we are concerned that the modification only provides the new interruptible product to new connections.

We would like to see this product available on a non discriminatory basis to any customer who requires re-enforcement works.

While we have raised our concerns over the limited scope of the current proposal with the proposer during the consultation period we have not received a substantive response to those concerns prior to the close out of the consultation period.

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

We would like to highlight our concerns over the ability for all customers who become subject to re-enforcement to have access to the proposed product.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

As stated in the modification proposal

Impacts and Costs:

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

We note the proposal is not User Pays

Implementation:

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

Subject to Authority approval we would not see a reason why the proposal could not be implemented as soon as reasonably practicable.

Legal Text:

Are you satisfied that the suggested legal text will deliver the intent of the modification?

We have not identified any issues with the proposed text.

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