Representation

Draft Modification Report

0421: Provision for an AQ Review Audit (previously 0379A)

Consultation close out date: 10 December 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: Winchester Gas Limited

Representative: Huw Comerford

Date of Representation: 16 November 2012

Do you support or oppose implementation?

Not in Support

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

While we support any change that can aid AQ performance, we feel that the application of shipper charges especially for small shippers could be potentially damaging and affect competition in the market place. We would consider supporting this modification if the shipper charges were applied to the percentage of supplies that the target was missed by i.e. a performance of 84% would result in a charge of 1% rather than 16% that the modification is currently proposing.

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

Relevant Objectives:
How would implementation of this modification impact the relevant objectives?

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

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

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?

Is there anything further you wish to be taken into account?
We would also query the worth of implementing this modification with the possibility of a rolling AQ being introduced within Project Nexus which would render this modification redundant within a couple of years of it being introduced.