

Representation

Draft Modification Report

Modification 0437S: Retention of MAM Id in Transporter Systems at Change of Shipper

Consultation close out date: 5th April 2013

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: 5th April 2013

Do you support or oppose implementation?

SUPPORT IMPLEMENTATION

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

We believe the implementation of Mod 0437S will protect the incoming Shipper from the risk of the previous Shippers failure to update the MAM ID.

In such circumstances the incoming Shipper is unable to identify the relevant incumbent MAM and has to bear the additional cost of identifying the previous MAM to enable it to then put in place suitable MAM arrangements e.g. NGM will not allow other parties to provide MAM services on their assets so we are unable to appoint our commercial MAM were NGM are the incumbent MAM

It is worth noting that at the time of the unbundling of the metering market many Shippers argued that the deletion of the previous MAM ID was fool hardy as it denied the new Shipper a valuable starting point when it was determining its MAM arrangements however despite these concerns the functionality to delete this important information was subsequently implemented.

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

No

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the view set out in the report that the proposal has a positive impact on Relevant Objective C

Impacts and Costs:

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

None identified

Implementation:

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

We would expect to see the implementation as soon as possible following a positive decision

Legal Text:

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

Not applicable

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.