

Representation

Draft Modification Report

0442 and 0442A:

Amendment to the implementation date of the Allocation of Unidentified Gas Statement (AUGS) for the 2013/14 AUG year

Consultation close out date: 22 February 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: National Grid Transmission
Representative: David Corby
Date of Representation: 22 February 2013

Do you support or oppose implementation?

0442 - Support

0442A - Support

If either 0442 or 0442A were to be implemented, which would be your preference?

No preference. The extent of the benefits of either modification is dependent on the shipper community's ability to respond to and reflect the successful proposal in their arrangements with end consumers. We therefore do not wish to state a preference for either proposal as we are not in a position to accurately gauge the balance of benefits.

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

We are supportive of the intent of both modifications on the basis that they seek to achieve a more accurate allocation of costs where and when such allocation is available.

0442

We are supportive of the principle of the AUGS to implement an even and appropriate allocation of unidentified gas.

We therefore believe that the stated aim of implementation of AUGS figures on 1st June would (given our statements above) satisfy the relevant objectives.

0442A

0442 and 0442A
Representation
04 February 2013

Version 1.0

Page 1 of 2

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We believe that the stated aim of implementation of AUGGE figures on 1st August (or as soon as possible thereafter) would also satisfy the relevant objectives and minimises the impact of not implementing on 1st April, but, dependent of the shipper community's ability to respond to the proposals, may not add as much value as the earlier implementation date recommended in 0442.

We are mindful that if the timescales set out in Modification 0442 cannot be met then Modification 0442A offers an alternative.

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

No

Relevant Objectives:

How would implementation of either of these modifications impact the relevant objectives?

We agree that the accurate allocation of energy between Shippers supports Relevant Objective (d) "Securing of effective competition: (i) between relevant shippers".

Impacts and Costs:

What analysis, development and ongoing costs would you face if either of these modifications were implemented?

None

Implementation:

What lead-time would you wish to see prior to either of these modifications being implemented, and why?

None

Legal Text:

Are you satisfied that the legal text will deliver the intent of each of these modifications?

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