

Stage 01: Modification

0456:

Revision to the treatment of Allocation of Unidentified Gas for the 2013/14 AUG Year

At what stage is this document in the process?

- 01 Modification
- 02 Workgroup Report
- 03 Draft Modification Report
- 04 Final Modification Report

This is a modification proposal to give effect to the new consumption based AUG Methodology and associated AUG Table for part of the 2013/14 formula year.



The Proposer recommends that this modification should:

- be treated as urgent and should proceed as such under a timetable agreed with Ofgem



High Impact:
Certain Consumers, Shipper Users



Medium Impact:



Low Impact:

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About this document:

The proposer recommends that this modification proposal should be treated as urgent and should proceed as such under a timetable agreed with Ofgem.

Further to Ofgem's published document entitled '*Ofgem Guidance on Code Modification Urgency Criteria*', the proposer believes that the particular circumstance which we are seeking to address under this modification proposal satisfies the following criteria:

1. Be linked to an **imminent issue or a current issue** that if not urgently addressed may cause:
 - a. **A significant commercial impact** on parties, consumers or other stakeholder(s);

Failure to agree urgency would preclude the earliest possible implementation of an AUG Methodology that has been recognised by both industry parties and the AUG E as being more robust and accurate than the incumbent version.

This proposal is linked to a current issue, which if not addressed will have significant commercial impact upon shipper parties and consumers, with smaller SSP shippers being particularly adversely impacted.

The 2012/13 AUG Methodology was rolled over to the 2013/14 AUG Year without amendment, therefore without modification, shipper parties and consumers will continue to be inappropriately exposed to an inaccurate allocation of unidentified gas costs until 31st March 2014.

Whilst the proposer is not aware of the actual total volume of unidentified gas, we understand that it is estimated at being in the region of 10TWh. For each month that passes and that this inaccurate allocation of unidentified gas continues, a monthly proportion of the ~10TWh will be the value of the impact to parties and consumers.

The volume of unidentified gas could be transposed to an approximate financial value, if required, by multiplying by the appropriate KWh £value.



Any questions?

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1 Summary

Is this a Self-Governance Modification?

No. We do not believe that this meets the criteria for Self-Governance Modifications since implementation would have a material impact on the allocation of costs between Shippers and so have a material impact on competition between Shippers.

Why Change?

The existing 2013/14 AUGS which included the RbD bias AUG Methodology is widely considered as being no longer fit for purpose, yielding an inaccurate output that perpetuates a long standing cross-subsidy from the predominantly domestic SSP sector to the predominantly commercial LSP sector. Without change to the UNC, this methodology and its resulting AUG Table will continue to be in place until 31 March 2014.

Detailed work has been undertaken by both the AUGE and industry participants since May 2012 to develop a new consumption based methodology. This work represents a major step forward towards achieving a more robust and accurate allocation of unidentified gas within the industry. The consumption based method of Unidentified Gas calculation has been proven to be statistically more accurate and negates previous concerns regarding the Reconciliation by Difference Bias method.

The AUGE submitted the first draft of the 2013 AUG Statement for the 2014/15 AUG Year, based upon a methodology that takes greater account of available data on consumption and theft than its previous RbD-based methodology.

This modification proposal seeks the preparation of an AUG Table, based upon the AUG Methodology detailed within the draft AUG Statement issued on 1st May 2013, and the implementation of this AUG Table (once approved by the Committee) on 1st October 2013.

Given that the industry has seen significant pressures on household incomes and, given the impact of recent energy prices, any opportunity to allocate costs associated with unidentified gas, more accurately and equitably across market sectors should be realised at the earliest opportunity.

It is also relevant to consider the impact that this allocation of costs will have on smaller domestic suppliers with greater pressures to manage their costs base, within more sensitive margins.

Solution

This modification proposal proposes the following:

- a) The AUGE shall submit the AUG Methodology, published within the draft AUG Statement as published by the AUGE on 1st May 2013, to the Committee in readiness for approval by 12 July 2013.¹
- b) The Committee shall approve the proposed AUG Methodology under a), in the form presented by the AUGE, unless they unanimously agree changes to any part of the document. Any changes directed by The Committee in this fashion will be implemented by the AUGE immediately.
- c) Upon approval of this Methodology by the Committee, the AUGE shall prepare and submit a final AUG Table, utilising the approved AUG Methodology detailed in a) and b), to the Committee in readiness for approval by 25 July 2013.²
- d) A meeting of the Committee will be organised for the adoption of the final AUG Table submitted by the AUGE under c), for approval by 25 July 2013.
- e) The Committee shall adopt the final AUG Table, unless by unanimous resolution the Committee determines that the AUG Table is not an accurate reflection of the AUG Methodology and revises the submitted AUG Table accordingly to reflect the AUG Methodology before adopting this revised AUG Table.
- f) Subject to the Committee's decision the Committee shall publish the AUG Table or revised AUG Table immediately after approval (not later than 1st August 2013).
- g) The AUG Table published shall be implemented on and take effect from 1st October 2013 and continue to apply until the commencement of the following 2014/15 AUG Year.

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¹ Based upon Chairman's guidelines we would expect the Methodology to be submitted by 4 July 2013

² Based upon Chairman's guidelines we would expect the final AUG Table to be submitted by the AUGE by 16 July 2013

For clarity, this modification proposal does not seek to suspend or amend the ongoing process to deliver the 2014/15 AUGS and subsequent AUG Table, which will be progressed during 2013 for implementation on 1st April 2014.

Further, it is assumed that the data utilised by the AUGE to prepare the final AUG Table as detailed in c) above, will be the most appropriate data held by the AUGE, as deemed by the AUGE, at the time of production.

Relevant Objectives

The proposer is of the view that this proposal meets the following Relevant Objective.

- d) Securing of effective competition:
 - (i) between relevant shippers;
 - (ii) between relevant suppliers; and/or
 - (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.

The proposer considers that the aims and objectives of this proposal promote effective and efficient competition between parties, and allow for an ongoing equitable distribution of unidentified gas charges between sectors. Further, the proposal will improve transparency and accuracy in the allocation of RbD gas to the contributing sector.

In the view of the Proposer, and for the reasons explained within this modification proposal, implementation of this proposal will prevent consumers connected to Smaller Supply Points from being exposed to a further six months of inaccurately apportioned unidentified gas costs.

Whilst the proposer is not aware of the actual total volume of unidentified gas, we understand that it is estimated at being in the region of 10TWh. For each month that passes and that the current inaccurate allocation of unidentified gas continues, a monthly proportion of the ~10TWh will be value of the impact to parties and consumers.

Should the proposal not be approved, a significant cross subsidy will continue to prevail across the SSP and LSP sectors, for the last six months of the AUG Year 2013/14, which in addition to having a significant commercial impact upon parties and consumers, will also have an adverse impact on competition in shipping and supply. This is a particular issue for smaller SSP shippers whose exposure to any inaccurate allocation could have significant commercial consequences.

Implementation

An implementation date of 1st July 2013 is proposed.

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2 Why Change?

Without change, an inequitable allocation of unidentified gas costs and a significant cross subsidy will continue to prevail across the SSP and LSP sectors, for the last six months of the AUG Year 2013/14, which will have a significant commercial impact upon both shippers and consumers, and particularly smaller domestic shippers.

As per Transportation Principal Document (TPD) Section E10 of the Uniform Network Code, the Allocation of Unidentified Gas Expert (AUGE) is responsible, for each AUG Year, for preparing an AUG Methodology and an AUG Table.

The AUG Year is defined within the UNC as the twelve month period commencing 1 April each year and ending on 31 March of the following year.

Within the 'Guidelines for the Appointment of an Allocation of Unidentified Gas Expert and the provision of the Allocation of Unidentified Gas Statement' paragraph 7.1.6, the AUGE is required to publish the proposed Allocation of Unidentified Gas Statement (AUGS), for the next AUG Year, by 1st August, with approval of the final document expected to take place on or around 1st September.

Once approved the AUGE is required to produce the indicative Unidentified Gas volumes for inclusion in the AUG Table by 1st October and to provide final Unidentified Gas volumes by 1st January.

Since 2011, the AUGE has been developing a revised methodology, that was expected to be ready during 2012 for implementation for the 2013/14 AUG Year, that would take greater account of available data on consumption and theft than its previous RbD-based methodology. For clarity, within this modification this is referred to as 'the consumption based methodology'.

The initial draft version of the consumption based methodology was initially consulted upon during the period 1st May 2012 to 15th June 2012. A revised version of this methodology was published on 17th December 2012 and was subject to an extended consultation period between 3rd January 2013 and 1st March 2013.

The results of the latest consultation have subsequently been reviewed by the AUGE and a further, revised version of the consumption based methodology was published on 1st May 2013. As the AUG process has subsequently moved into the 2014/15 AUG Year process period, this recent version has been marked as a first draft of the 2014/15 AUG Statement, whereas it is actually a third iteration of the extensively consulted upon consumption based methodology developed during 2012.

The latest version of the consumption based methodology published on 1st May 2013, is the product of over eighteen months worth of development work, analysis and consultation. The supporting rationale is therefore well understood by industry parties and has been the subject of multiple consultation periods.

The consumption based methodology has been previously, commonly socialised and is in a condition where it is already well understood by all code parties, and has been confirmed by the AUGE as being more robust and statistically more accurate than the current RbD bias AUG Methodology.

Our analysis of the most recent version of the consumption based methodology, when compared against the version previously published on 17th December 2012 shows that this version is fundamentally based upon the same principles as laid out in the previous December 2012 version, with total unidentified gas being calculated using consumption data, calculable contributions then subtracted leaving a balancing number that is still allocated by throughput.

Given the extensive level of consultation already undertaken of previous iterations of the consumption based methodology, the proposer does not believe that further consultation is necessary to enable a more accurate AUG Table to be implemented on 1 October 2013.

Whilst further consultation will continue to take place in accordance with the Guidelines for the preparation of the 2014/15 AUGS, this should be treated as a separate activity.

An appendix has been added to the proposal, providing a high level overview of the key AUG process milestones (as per the AUGE Guidelines), along with an overview of activities already undertaken during 2012 and 2013, prior to the publication of the '1st Draft AUG Statement for 2014/15' on 1st May 2013.

Within Ofgem's decision letter on Modification Proposal 0442 a number of points were raised, which this proposal seeks to address.

Improved Accuracy versus Certainty

Ofgem wrote that: *'In considering whether a revision should be made to both the AUG methodology and the AUG table outside of the anticipated timescales, a balance must*

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be struck between the improved accuracy that may result from that revision and the increased uncertainty and sufficient notice for shippers to react appropriately to their allocation of cost, for instance by factoring them into their tariffs or planning to absorb them.'

This modification proposes a minimum two month lead time between, the date that the final AUG Table is published and the date from which the published final AUG Table will be implemented and become effective.

This proposed lead time aligns with previous iterations of the AUG process. For example, for the 2013/14 AUG year, a final table was published on 1 February 2013, for implementation on 1 April 2013. Further, for the 2012/13 AUG Year, clarification of the final AUG Table to be used from 1 April 2012, was not published until 13 March 2012.

A two month lead time has historically provided suppliers with sufficient time to implement values associated with the publication of a new AUG Table and provides consistency with section 9.3(b) of the AUG Guidelines which requires publication of the final AUG Table by 1 February, along with an estimate of the rates to be levied, in readiness for implementation on 1 April.

The proposed implementation date within this proposal of 1 October 2013, preceded by the publication of the final AUG Table by 1 August 2013, provides consistency with both the guidelines and historic practice and affords suppliers with ample opportunity to reflect any cost changes within their contractual arrangements or plan for absorbing.

We note that the 1 October 2013 aligns with the start of the official Gas Year and that this date is also a recognised start date for new contractual arrangements with many LSP consumers.

The proposer remains concerned that non-implementation of this proposal could perversely result in the industry not introducing, at the earliest possible opportunity, a knowingly more robust and statistically accurate AUG Methodology and subsequent AUG Table, which would provide a fairer and more representative split of unidentified gas costs between the SSP and LSP sectors and remove the existing cross-subsidy.

The overall scale of unidentified gas across the industry is significant. Whilst the proposer is not aware of the actual total volume of unidentified gas, we understand that it is estimated in the region of 10TWh. Whilst the overall financial value is not precisely known by the proposer, the amount of unidentified gas is so significant in size, that any opportunity to more accurately allocate unidentified gas in a more fair and equitable manner should be taken at the earliest opportunity.

The AUG should be able to provide Ofgem with a more accurate view of their current view of the total size of unidentified gas and the market sector impacts of implementing an AUG Table, based upon the latest, published version of the AUG Methodology. Allowing Ofgem to obtain clarity of the financial materiality of this issue as required.

Distributional Effects

Ofgem wrote: *'In order to be more confident that the benefits of bringing forward the effective date of the revised methodology would offset the increased uncertainty and risk, we would also want to see more information from shippers on the extent to which, and when, this change would be reflected in tariffs.'*

Whilst this is not an issue that can or should be addressed under the auspices of the Uniform Network Code, it is self-evident that lower underlying costs for domestic customers, combined with competitive pressure on price can only have a positive impact. Shippers will be able to discuss these matters individually directly with Ofgem, providing Ofgem with the information they seek in this regard.

It is evident to the proposer that the latest version of the AUG Methodology represents a major step forward towards a more robust and accurate allocation of unidentified gas within the industry. The consumption based method of unidentified gas calculation has been proven to be statistically more accurate and negates previous concerns regarding the RbD bias AUG Methodology. In addition, the sector theft allocation contained within the current AUG Methodology has since been shown to be highly inaccurate, which has a significant overall effect. The new consumption based AUG Methodology addresses this issue.

It is further evident to the proposer that the RbD bias AUG Methodology, which was subsequently rolled forward and utilised again for the 2013/14 AUG Year, has been proven to be no longer fit for purpose and continues to yield an inaccurate output – an outcome which the proposer believes is wholly inappropriate and unacceptable.

The effect of not rectifying this issue at the earliest opportunity perpetuates this very long standing cross-subsidy from the mostly domestic SSP sector to the mostly commercial LSP sector. The Allocation of Unidentified Gas process has played a critical role in addressing an historic deficiency and it is the view of the proposer that it

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would be perverse for the industry not to implement a more robust, statistically more accurate and fairer methodology as soon as possible.

Given that the industry has seen significant pressures on household incomes with the impact of recent energy prices and the current challenging economic climate, the proposer believes it prudent that any opportunity to more correctly and equitably allocate costs should be realised at the earliest opportunity.

The proposer considers that it is also pertinent to consider the impact that this allocation of costs will have on smaller domestic suppliers with greater pressures to manage their costs base, within more sensitive margins.

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3 Solution

This modification proposal proposes the following:

- a) The AUGE shall submit the AUG Methodology, published within the draft AUG Statement as published by the AUGE on 1st May 2013, to the Committee in readiness for approval by 12 July 2013.³
- b) The Committee shall approve the proposed AUG Methodology under a), in the form presented by the AUGE, unless they unanimously agree changes to any part of the document. Any changes directed by The Committee in this fashion will be implemented by the AUGE immediately.
- c) Upon approval of this Methodology by the Committee, the AUGE shall prepare and submit a final AUG Table, utilising the approved AUG Methodology detailed in a) and b), to the Committee in readiness for approval by 25 July 2013.⁴
- d) A meeting of the Committee will be organised for the adoption of the final AUG Table submitted by the AUGE under c), for approval by 25 July 2013.
- e) The Committee shall adopt the final AUG Table, unless by unanimous resolution the Committee determines that the AUG Table is not an accurate reflection of the AUG Methodology and revises the submitted AUG Table accordingly to reflect the AUG Methodology before adopting this revised AUG Table.
- f) Subject to the Committee's decision the Committee shall publish the AUG Table or revised AUG Table immediately after approval (not later than 1st August 2013).
- g) The AUG Table published shall be implemented on and take effect from 1st October 2013 and continue to apply until the commencement of the following 2014/15 AUG Year.

For clarity, this modification proposal does not seek to suspend or amend the ongoing process to deliver the 2014/15 AUGS and subsequent AUG Table, which will be progressed during 2013 for implementation on 1st April 2014.

Further, it is assumed that the data utilised by the AUGE to prepare the final AUG Table as detailed in c) above, will be the most appropriate data held by the AUGE, as deemed by the AUGE, at the time of production.

User Pays

Classification of the modification as User Pays, or not, and the justification for such classification.

Changes to Xoserve's system for calculating AUG costs are expected to be necessary to implement either modification, and hence the Modification would fall within the definition of User Pays and be classified as such. This small change is estimated to cost less than £50k.

Identification of Users of the service, the proposed split of the recovery between Gas Transporters and Users for User Pays costs and the justification for such view.

Shippers would be users of the service and bear 100% of the cost because there is no benefit for Transporters.

Proposed charge(s) for application of User Pays charges to Shippers.

It is proposed that the costs associated with implementation should be added to other AUGE costs and be billed as part of that sum, as already provided for in the Agency Charging Statement.

Proposed charge for inclusion in the Agency Charging Statement (ACS) – to be completed upon receipt of a cost estimate from Xoserve.

Xoserve's estimated implementation cost is in the low category, and would be expected to be under £50k.

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³ Based upon Chairman's guidelines we would expect the Methodology to be submitted by 4 July 2013

⁴ Based upon Chairman's guidelines we would expect the final AUG Table to be submitted by the AUGE by 16 July 2013

4 Relevant Objectives

Impact of the modification on the Relevant Objectives:	
Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	None
b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.	None
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	Impacted
e) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers.	None
f) Promotion of efficiency in the implementation and administration of the Code.	None
g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

The proposer considers that the aims and objectives of this proposal promote effective and efficient competition between parties, and allow for an ongoing equitable distribution of unidentified gas charges between sectors. Further, the proposal will improve transparency and accuracy in the allocation of RbD gas to the contributing sector.

In the view of the Proposer, and for the reasons explained within this modification proposal, implementation of this proposal will prevent consumers connected to Smaller Supply Points from being exposed to a further six months of inaccurately apportioned unidentified gas costs.

Whilst the proposer is not aware of the actual total volume of unidentified gas, we understand that it is estimated at being in the region of 10TWh. For each month that passes and that the current inaccurate allocation of unidentified gas continues, a monthly proportion of the ~10TWh will be value of the impact to parties and consumers.

Should the proposal not be approved, a significant cross subsidy will continue to prevail across the SSP and LSP sectors, for the last six months of the AUG Year 2013/14, which in addition to having a significant commercial impact upon parties and consumers, will also have an adverse impact on competition in shipping and supply. This is a particular issue for smaller SSP shippers whose exposure to any inaccurate allocation could have significant commercial consequences.

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5 Implementation

An implementation date of 1st July 2013 is proposed. 1st October 2013 is the date at which the new AUG Table takes effect. This implies that the new AUG Table must be published by 1st August 2013 to ensure that an appropriate notice period of change can be provided.

6 Legal Text

Legal Text is to be provided by the Gas Transporter.

7 Recommendation

The Proposer recommends that this proposal is issued for consultation under an urgent timetable.

8 Appendix 1

Overview of the key AUG process milestones, along with an overview of activities already undertaken during 2012 and 2013, which lead to the publication of the '1st Draft AUG Statement for 2014/15' on 1st May 2013.

As demonstrated below, the '1st Draft AUG Statement for 2014/15' has already been extensively consulted upon, notably more than is indicated within the AUGE Guidelines. The AUGE has considered all submissions made within the consultation periods and have amended the latest version as they deem appropriate, in their role as the independent expert.

- The AUGE must provide a Draft AUGS for presentation and publication by the 1st May each year
(AUGE Guidelines 7.1.1)
 - The document entitled '1st Draft AUG Statement for 2014/15' which was published on 1st May 2013 by the AUGE, is actually a third iteration of the extensively consulted upon consumption based methodology developed during 2012.
- Once published, any responses must be received within 42 days, with responses provided by the GTs to the AUGE by 15th June
(AUGE Guidelines 7.1.3)
 - The initial version of the most recently published AUGS, was originally published on 30th April 2012. The initial consultation period ran from 1st May 2012 to 15th June 2012.
- The AUGE will consider any submissions made, and will provide feedback for discussion at a meeting which is to be held on or around the 1st July
(AUGE Guidelines 7.1.4)
 - UNCC (AUGE) meetings took place on 22nd May 2012 and 17th September 2012.
 - Further UNCC (AUGE) meetings took place on 6th February 2013 and 15th May 2013.
- The AUGE will review the AUGS in light of any comments (received under 7.1.3) and will adjust the AUGS where it believes appropriate
(AUGE Guidelines 7.1.5)
 - Comments were received by the AUGE from industry parties for the initial consultation period (1st May 2012 to 15th June 2012). These comments were subsequently processed by the AUG, which lead to the 2nd Draft AUGS being issued on 17th December 2012.
- The proposed AUGS document will be published by the 1st August
(AUGE Guidelines 7.1.6)
 - The 2nd Draft AUGS was published on 17th December 2012. This AUGS was subject to a further period of consultation which ran from 3rd January 2013 to 1st March 2013. During the consultation period, a UNCC (AUGE) meeting took place on 6th February 2013.
 - The AUGE's response to queries arising from 2nd Draft AUGS consultation (3rd January 2013 to 1st March 2013), was published on 12th March 2013. A review of the consultation responses received by the AUGE, were subsequently processed by the AUG resulting in the publication of the '1st Draft AUG Statement for 2014/15' on 1st May 2013.
- Code parties may provide responses to The Committee on the proposed AUGS (as published under 7.1.6) no later than 5 Business Days prior to the next Committee meeting
(AUGE Guidelines 7.1.7)
 - As the 'proposed AUGS document' was not 'published by 1st August' (as per AUGE Guideline 7.1.6), this step of the process was not

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utilised last year. However, comments were provided by industry parties during both of the consultation periods which occurred.

- Once the proposed AUGS documents have been published, a meeting of The Committee and the AUGE will be organised for approval of the final document, on or around the 1st September. The Committee shall approve the proposed AUGS, in the form presented by the AUGE, unless they unanimously agree changes to any part of the document. Any changes directed by The Committee in this fashion will be implemented by the AUGE immediately.

(AUGE Guidelines 7.1.8)

- Approval of the final document did not take place on or around the '1st September', as the 2nd Draft AUGS was not published until 17th December 2012. Ultimately, as the full AUG process was unable to be completed in time to adopt a revised AUGS for the 2013/14 AUG Year, the previous years methodology was agreed to be 'rolled over'.
- Once approved by The Committee, the AUGE will produce the indicative Unidentified Gas volumes in a format consistent with the UNC requirements, and send them to the GTs for inclusion in the AUG Table for the AUG Year by 1st October

(AUGE Guidelines 7.1.9)

- This step did not occur as there was no proposed AUGS for approval, so the previous years volumes were rolled over.
- The AUGE will provide the final Unidentified Gas volumes and rates to the GTs by the 1st January

(AUGE Guidelines 7.1.10)

- The AUGE published the final AUGS table of volumes and rates on 1st February 2013, the volumes were the 'rolled over' figures from the previous year.

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