

## Representation

### Draft Modification Report

#### 0456 (Urgent): - Revision to the treatment of Allocation of Unidentified Gas for the 2013/14 AUG Year

**Consultation close out date:** 11 June 2013  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** Winchester Gas  
**Representative:** Huw Comerford  
**Date of Representation:** 07 June 2013

#### Do you support or oppose implementation?

Support

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

We believe that any improvement in the allocation of unidentified gas should be implemented and that currently the SSP market is being over allocated. As a small shipper the allocation of unidentified gas can add considerable costs to the business.

#### 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?*

#### 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.*

While we support the use of SSP consumption to calculate the unidentified gas, we do have a concern over the accuracy of some of the usage in the SSP market due to the lack of read validation done by the GT compared to those supplies within the LSP market.