Representation

Draft Modification Report

0521 - Revision of User Admission Criteria to include Transporter verification of its ability to transact with the Applicant User

Consultation close out date:	16 January 2015
Respond to:	enquiries@gasgovernance.co.uk
Organisation:	EDF Energy
Representative:	John Costa
Date of Representation:	16 January 2015

Do you support or oppose implementation?

Support

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

Implementation of this modification will close out an identified risk in the arrangements where new Users could become signatories to the UNC code and trade without testing whether the Gas Transporter's bank could accept payments from their account. This is particularly the case where there are financial sanctions on certain companies and could lead to additional financial exposure for the Shipper community. Bringing this bank check forward in the process so that it is done as part of the accession criteria will close out this risk as it would mean the User could be stopped from acceding to the Code before commencing trading activity.

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 that this modification would better facilitate Relevant Objective (d) better facilitating effective competition between relevant shippers, as it would minimise the risk of bad debt being incurred and recovered from other Users.

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

None

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

0521
Representation

Page 1 of 2
© 2015 all rights reserved

Version 1.0
18 December 2014

This modification should take immediate effect following a decision to implement.

Legal Text:
Are you satisfied that the legal text will deliver the intent of the modification?

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

Legal Text: