

## Representation - Draft Modification Report 0545S Changes to GDN MOD186 Publication dates

Responses invited by: **08 October 2015**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

<b>Representative:</b>	Jon Trapps, Pricing Manager
<b>Organisation:</b>	Northern Gas Networks
<b>Date of Representation:</b>	09 October 2015
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	f) Positive

**Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)**

The MOD186 pricing report is the gas distributions quarterly revenue update, which provides gas shippers with a 5 year profile of GDN's allowed revenue and associated price changes. GDN's have worked with shippers over recent years to improve the detail around this reporting process whilst also standardising the format for ease of use across all networks.

From a GDN perspective there are some areas that have to be forecast because of the timing of publication. If the timing of the quarterly updates was changed it could be better aligned to key RIIO processes (Ofgem Annual Iteration Process) and other areas such as the RPI treasury forecast publication dates. NGN raised the modification to improve the efficiency of the process which would be of benefit to both GDN's and gas shippers alike. Provisions of more certain information within the report by amending the timing would allow shipper to better utilise it, which could, in turn improve competition between shippers.

**Self-Governance Statement:** *Please provide your views on the self-governance statement.*

Northern Gas Networks believes this satisfies the Self Governance Criteria

**Implementation:** *What lead-time do you wish to see prior to implementation and why?*

Northern Gas Networks could move to the new timetable asap.

**Impacts and Costs:** *What analysis, development and ongoing costs would you face?*

None

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

None

**Are there any errors or omissions in this Modification Report that you think should be taken into account?** *Include details of any impacts/costs to your organisation that are directly related to this.*

None

**Please provide below any additional analysis or information to support your representative**

None