

## Representation Draft Modification Report

### Modification 0810S Amendment of Transportation Principal Document Section V 14.1.1 and Annex-V5 to reflect updated Theft of Gas Process

- 1. Consultation close out date:** 15<sup>th</sup> July 2022
- 2. Respond to:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)
- 3. Organisation:** Gazprom Energy  
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8 First Street  
Manchester  
M15 4RP
- 4. Representative:** Steve Mulinganie  
Regulation Manager  
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0799 097 2568 / 0751 799 8178
- 5. Date of Representation:** 15<sup>th</sup> July 2022
- 6. Do you support or oppose Implementation:**  
As the proposer we **Support** implementation of the Modification
- 7. Please summarise (in 1 paragraph) the key reason(s) for your position:**  
This housekeeping modification removes a requirement that is redundant following the implementation of Modification 0734S "Reporting Valid Confirmed Theft of Gas into Central Systems and Reporting Suspected Theft to Suppliers
- 8. Are there any new or additional Issues for the Modification Report:**  
**No**
- 9. Self-Governance Statement Do you agree with the status?**  
**Yes**, this is a housekeeping modification
- 10. Relevant Objectives:**  
*How would implementation of this modification impact the relevant objectives?*  
This Modification seeks to ensure that the legacy report for the Shipper theft of gas process is removed to be replaced by the process introduced under Modification 0734S. The justification of the original Modification applies.

Modification 0734S was justified in the following way:

The proposal is positive in relation to Relevant Objective d) Securing of effective competition as it provides a mechanism by which energy relating to valid thefts is more accurately allocated between Shippers.

This Modification is also positive in relation to Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code as it looks to remove a legacy report which will be redundant following the implementation of Modification 0734S remaining in UNC.

#### **11. Impacts & Costs:**

*What analysis, development and on-going costs would you face if this modification was implemented?*

We **have not** identified any significant costs associated with the implementation of this modification

#### **12. Implementation:**

*What lead times would you wish to see prior to this modification being implemented, and why?*

Implementation must align with Modification 0734S (effective implementation date TBC) to ensure the legacy theft reporting; "Shipper TOG Report" is removed when the new theft process is in place and the legacy report is redundant.

#### **13. Legal Text:**

*Are you satisfied that the legal text will deliver the intent of the modification?*

We have **no comments** on the Legal Text provided.

#### **14. Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or you wish to emphasise.*

**No**