

Representation

Draft Modification Report

0326VV - Allocation of unidentified gas following the appointment of the Allocation of Unidentified Gas Expert (AUGE)

Consultation close out date: 06 January 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: **E.ON UK**

Representative: Brian Durber

Date of Representation: 06 January 2012

Do you support or oppose implementation?

Support

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

The AUGE carries out their analysis based upon information available at the time, should information subsequently become available that can be clearly demonstrated to better reflect the true situation then this should be used subject to prevailing limitations on the invoice reconciliation period.

The work of the AUGE is technical in nature and there already exists precedent in the area of offtake meter errors which become identified and following analysis the adjustments are then applied retrospectively to better reflect true gas flow over the period. It should be noted that offtake metering is inferential, i.e. it 'infers' flow rather than positively measures it. Any corrections are by nature estimation albeit a better estimation. This seems a very similar process to the AUGE analysis and so we believe the principle is already established.

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?

Legal Text:

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

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.