

Representation Draft Modification Report

Modification 0474S: Inclusion of the guidelines relating to the “Customer Settlement Error Claims Process” within UNC governance and introduction of the User Pays charges associated with such claims.

1. **Consultation close out date:** 7th May 2014
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:** Gazprom Energy
Bauhaus, 5th Floor
27 Quay Street
Manchester
4. **Representative:** Steve Mulinganie
Regulation Manager
stevemulinganie@gazprom-mt.com
07590 245 256
5. **Date of Representation:** 7th May 2014
6. **Do you support or oppose Implementation:**
We Support Implementation
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
We support the introduction of clear guidelines to aid the implementation of Modification 0429 “Customer Settlement Error Claims Process”
8. **Are there any new or additional Issues for the Modification Report:**
We have not identified any new or additional issues
9. **Self-Governance Statement Do you agree with the status?**
We agree with the Self Governance status
10. **Relevant Objectives:**
How would implementation of this modification impact the relevant objectives?
We agree with the modifications proposer that the implementation of the proposal better facilitates relevant objective (f)

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?

We would like to see the guidelines implemented as soon as reasonably practicable

13. Legal Text:

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

Whilst the modification is predicated on providing certainty to Users by providing a set of clear guidelines the legal text provided specifically reflects that the document is for guidance only and is not binding on Users or Transporters (1.3.11). It is therefore not clear what happens should user/s choose to set aside the non-binding guidance.

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.

The workgroup has discussed the charges associated the process and it was noted that these would be based on a time and materials basis and that the relevant rates would be provided e.g. day, half day and hourly rates. We have yet to have sight of these rates and the draft ACS has charges as tbc.

It was also agreed that users could request a quotation to enable them to determine the cost of proceeding with the claim. The quotation can therefore be sought without a commitment to proceed with the claim however this “quotation process” is not currently reflected in the proposal or guidelines.