

Representation Draft Modification Report

Modification 0458: Seasonal LDZ System Capacity Rights

1. **Consultation close out date:** 22nd April 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:** 22nd April 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 agree with the modification proposer that the introduction of a “Seasonal LDZ Capacity Rights” product will better reflect the actual “Off peak” use of capacity by certain Users. In doing so it will avoid the need for unnecessary re-enforcement which is currently triggered as these Users are deemed to require capacity during “Peak” periods.
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 that this proposal is not subject to self-governance
10. **Relevant Objectives:**
How would implementation of this modification impact the relevant objectives?
We agree with the modification proposer that the proposal is positive in respect of relevant objectives (a), (b) & (c)

11. Impacts & Costs:

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

We have not identified any material costs associated with the modification being implemented

12. Implementation:

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

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

13. Legal Text:

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

We have not reviewed 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.

Assuming the modification is implemented before the 30th September 2014 it may be helpful to clarify that Users can access the product during the remaining 2014 “Off Peak” season. It would also be helpful to confirm if in future seasons Users are able to access the product during the “Off Peak” season or have to apply for the product prior to the relevant “Off Peak” season commencing.