

Representation - Draft Modification Report 0545S

Changes to GDN MOD186 Publication dates

Responses invited by: **08 October 2015**

To: enquiries@gasgovernance.co.uk

Representative:	Robert Wigginton, Pricing Manager
Organisation:	Wales & West Utilities Ltd
Date of Representation:	29 th September 2015
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

The MOD186 report, presented through the Distribution Charging Managers Forum (DCMF), allows Shippers to understand likely future charges and their effect on the customer bill. The current timing of this publication results in information potentially becoming quickly outdated as assumptions crystallise shortly after publication. Significant assumptions which crystallise shortly after publication currently include:

1. MODt adjustment published in November
2. HMRC Inflation figures in November
3. Final Pricing Statements in January

Any significant movement from assumed values would not be communicated to shippers until the next quarterly report.

By changing the publication dates (and associated GDN/Shipper meeting dates) it would result in fewer assumptions having to be made, resulting in:

- Less time needed explaining variations between assumed and actual figures at DCMF and in the MOD186 report
- Reduction in movements between subsequent publications
- Increased consistency where each GDN may use different assumptions to forecast unknown variables.

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

Wales & West Utilities believes this satisfies the Self Governance Criteria.

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

Wales & West Utilities would be able to adhere to the new time table at the next proposed solution date following approval.

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?*

Yes

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 noted

Please provide below any additional analysis or information to support your representation

N/A