

Representation - Draft Modification Report 0569S

Removal of the minimum security requirement from the Energy Balancing Credit Rules

Responses invited by: **11 February 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Mark Cockayne
Organisation:	EBCC
Date of Representation:	11 February 2016
Support or oppose implementation?	Oppose* <i>delete as appropriate</i>
Relevant Objective:	d) Negative* <i>delete as appropriate</i>

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

Thank you for the opportunity to provide representation in relation to this modification. Members of the EBCC are not supportive of the removal of the minimum level of security, currently set at £10,000. Members believe that the drivers that existed when implementing this limit within the Energy Balancing Credit Rules have not changed and believe that the removal of the limit has the potential to expose the community to avoidable financial loss.

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

Agree with the Panels determination that the criteria for Self-Governance has been met.

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

Usual notification period

Impacts and Costs: What analysis, development and ongoing costs would you face?

No implementation costs

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.*

No

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

Insert text here