

Representation - Draft Modification Report 0572

Amendment to the definition of AUG Year within UNC TPD Section E

Responses invited by: **5pm 11 April 2016**

To: enquiries@gasgovernance.co.uk

Representative:	David Mitchell
Organisation:	Scotland Gas Networks and Southern Gas Networks
Date of Representation:	11 th April 2016
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

SGN supports the implementation of this modification as it reduces the 9 month lag following the Auge review down to 6 months. Using data that more current will no doubt increase the accuracy when calculating unidentified gas costs between Shipper Users which will mean that costs are more reflective across the industry. It is important to add that we can see no impact on the current Auge service itself.

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

SGN does not believe that this modification fulfils the requirements for self-governance as it could have a material impact on competition in the gas Shipping market.

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

We agree with the suggested implementation timeline in the modification.

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

N/A

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.*

N/A

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

N/A