

Representation
Draft Modification Report 0572: Amendment to the definition of
AUG Year within UNC TPD Section E

Modification Report

1. **Consultation close out date:** 11th April 2016
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:** Gazprom Energy
3rd Floor, 1 Tony Wilson Place
First Street
Manchester
M15 4FN
4. **Representative:** Steve Mulinganie
Regulation & Compliance Manager
stevemulinganie@gazprom-mt.com
07590 245 256
5. **Date of Representation:** 11th April 2016
6. **Do you support or oppose Implementation:**
We **Oppose** implementation of Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
Under the NEXUS arrangements the Formulae AQ will now be implemented on the 1st April (Based on the December rolling AQ data). Therefore we believe the existing arrangements should continue as they align to this key industry process allowing customers to experience less uncertainty and volatility around their costs for the following 12 months. On balance we believe the consumer detriment caused by bringing forward the date from April to October offsets any unproven potential “benefit” that may arise from this modification.
8. **Are there any new or additional Issues for the Modification Report:**
No
9. **Self-Governance Statement Do you agree with the status?**
Not Applicable

10. Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We believe the proposal is not positive in relation to Relevant Objective (d) as the proposed date changes would have a negative impact on Shippers and Suppliers, as they would have a reduced timeframe to reflect the impacts of the AUG Table in their prices, which would be detrimental to competition.

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 this modification

12. Implementation:

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

We have no preference as we do not support the proposal

13. Legal Text:

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

We have no comments on 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.

No.