

Representation

Draft Modification Report 0580S Implementation of Non Effective Days to enable Annual AQ Review (independent of Nexus transition)

Modification Report

1. **Consultation close out date:** 10th June 2016
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:** Gazprom Energy
Bauhaus, 5th Floor
27 Quay Street
Manchester
4. **Representative:** Steve Mulinganie
Regulation & Compliance Manager
stevemulinganie@gazprom-mt.com
0799 097 2568
5. **Date of Representation:** 9th June 2016
6. **Do you support or oppose Implementation:**
We **Support** implementation of Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
We support this proposal as it provides certainty that the number of non-effective days required for the annual AQ process will be the same whether or no Nexus goes live on the 1st October 2016
8. **Are there any new or additional Issues for the Modification Report:**
No
9. **Self-Governance Statement Do you agree with the status?**
As the modification has been subject to change with the number of days being increased to 7 we believe the proposal is no longer Self Governance
10. **Relevant Objectives:**
How would implementation of this modification impact the relevant objectives?
We agree with the proposer that this modification is positive in respect of Relevant Objective (f)

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 would like to see the proposal implemented as soon as reasonably practicable after a decision

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.