

## Representation

### Draft Modification Report

#### 0450 0450A 0450B - Monthly revision of erroneous SSP AQs outside the User AQ Review Period

**Consultation close out date:** 12 December 2013  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** Winchester Gas  
**Representative:** Huw Comerford  
**Date of Representation:** 26 November 2013

#### Do you support or oppose implementation?

0450 - Neutral

0450A - Not in Support

0045B - Support

#### If either 0450, 0450A or 0450B were to be implemented, which would be your preference?

Prefer 0450B

#### Please summarise (in one paragraph) the key reason(s) for your support/opposition.

Erroneous AQ's can have a detrimental financial impact on shippers, and therefore affect their ability to compete. We believe that by allowing shippers to appeal SSP AQs outside the current AQ review period will ensure that shippers receive a more accurate allocation. Our preference is for 450B to be implemented as we believe that the number of appeals that would be allocated under 450 & 450A would favour large shippers over small and is more in line with the original intentions of 450.

#### Are there any new or additional issues that you believe should be recorded in the Modification Report?

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

We believe that more accurate allocation of cost can only have a positive impact on competition in the market.

#### Impacts and Costs:

*What analysis, development and ongoing costs would you face if this modification were implemented?*

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Representation

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26 November 2013

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Version 1.0

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We would only incur minimal costs to implement this, however if 450A were to be implemented we would expect the costs to be higher due as it would be part of the change of supply process.

**Implementation:**

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

Since there are minimal costs and little system work to implement this we would welcome implementation as soon as possible, with a 1 month lead time needed.

**Legal Text:**

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

**Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*