

## 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:** Opus Energy  
**Representative:** Paul Bedford  
**Date of Representation:** 11 December 2013

#### Do you support or oppose implementation?

0450 - Support

0450A - Not in Support

0450B - Support

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

Prefer 0450B

(We support, in order of preference, Mod 0450B then Mod 0450)

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

The current inability of shippers to amend erroneous SSP AQs outside the User AQ Review Period negatively affects all shippers and suppliers but this is particularly pronounced in the case of smaller shippers who face a disproportionately increased and inaccurate level of charges and gas purchase costs as a result. We are concerned that the original proposal (UNC450) has been changed (under UNC450A) so that it no longer reflects the original intent to help alleviate the disproportionate burden on smaller suppliers created by the current impossibility of amending SSP AQs outside the AQ review period. We are therefore in support of UNC450B for which the proposed new baseline of 200 appeals per month should be sufficient to achieve the original UNC450 intent of facilitating effective competition between shippers and suppliers. Our second preference (which we also support) would be UNC450 which has a proposed new baseline of 50 appeals per month. For the reason as outlined above we are not supportive of UNC450A.

0450 0450A 0450B  
Representation

---

11 December 2013

---

Version 1.0

---

Page 1 of 2

---

© 2013 all rights reserved

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

No

**Relevant Objectives:**

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

Implementation of UNC450B (or UNC450) would further effective competition between relevant shippers in line with relevant objective d) and help increase AQ accuracy which would allow more accurate distribution of volume and costs.

**Impacts and Costs:**

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

It is estimated that analysis, development and ongoing costs if this modification was implemented would be low.

**Implementation:**

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

Estimated lead time would be in the order of 3 months.

**Legal Text:**

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

Yes

**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.*

No