



Gazprom Energy
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Representation

Draft Modification Report

Modification 0431: Shipper/Transporter – Meter Point Portfolio Reconciliation

Consultation Close out date: **12th December 2013**

Respond to: enquiries@gasgovernance.co.uk

Organisation: Gazprom Marketing & Trading Retail (GMT&R)
Trading as Gazprom Energy

Representative: Steve Mulinganie
Regulation & Compliance Manager

Date of Representation: **12th December 2013**

Do you support or oppose implementation?

SUPPORT

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

We support the intention of the proposal and recognise that the proposer has varied the modification to address concerns raised on the drafting. As a Shipper who both ships for both our own supply business but also for a number of third party suppliers we welcome the changes made to recognise these relationships.

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

No

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Self-Governance Statement:

Do you agree with the Modification Panel's decision that this should not be a self-governance modification?

Yes

Relevant Objectives:

(How would implementation of this modification impact the relevant objectives)?

We agree with the justification under Objective (d) as set out in the final modification report

Impacts and Costs:

What analysis, development and on-going costs would you face if this modification were implemented?

We will need to introduce a new internal process to manage this annual task which will also impact on both our own supply business and also our third party suppliers. The full on-going operational costs of undertaking this exercise are difficult to assess until we have actual experience of the number of queries generated. It is also unclear, at this time, what the impact of auto registration will be.

Implementation:

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

We would like to see a reasonable implementation period to enable us to put in place processes and to develop reports both within our own supply business but also with our third party suppliers. We will also need to consider the impact of the exercise on the existing sales and registration processes.

As it is proposed to run the exercise each November we would therefore consider that implementation of the modification should be in line with undertaking the first exercise in November 2014

Legal Text:

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

We have not reviewed the legal text

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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 emphasize.

NO

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