

Representation

Draft Modification Report

0481 – Amendment to AQ Values Present Within Annex A of the CSEP NExA AQ Table Following the 2013 AQ Review

Consultation close out date: 21 March 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: SSE
Representative: Mark Jones
Date of Representation: 21 March 2014

Do you support or oppose implementation?

Support

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

The current CSEP NExA table values are based on figures from the 2010 AQ review. Following the 2013 AQ review it was identified that these figures are no longer accurate. The CSEP NExA values are fixed and are the basis of the Transportation charges issues by the iGTs and so it is important that these values reflect any changes in the market.

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

No.

Self Governance Statement:

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

Yes, as it will have a material impact on competition and affect iGTs' revenue.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We believe that implementation of this modification would positively impact relevant objective d) Securing of effective competition, as increased accuracy of AQ values should result in improved allocation of energy and costs between Shippers and, therefore, promote effective competition.

Impacts and Costs:

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

No costs identified.

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Implementation:

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

This modification could be implemented as soon as possible.

Legal Text:

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

Yes. The new updated table is effectively the legal text.

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.