

Representation

Draft Modification Report

0475S - Update to Section G, Annex G3 (Prospective Erroneous Large AQ Calculation Proforma)

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Consultation close out date:	06 June 2014
Respond to:	enquiries@gasgovernance.co.uk
Organisation:	British Gas Trading
Representative:	Andrew Margan
Date of Representation:	30 May 2014

Do you support or oppose implementation?

Support

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

Mod UNC 475S seeks to update the CSEP NExA Table held under code in Section G, Annex G3. This will better reflect the latest values and ensure parties are charged appropriate Transportation costs, which should help to secure effective competition between shippers and their relevant suppliers. Therefore we support this change.

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 be a self-governance modification?

Yes

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We believe this change meets relevant objective d) Securing of effective competition between Shippers.

We also believe that the change could have an administrational benefit. Whilst the UNC table use differs to the use of the CSEP NExA table under other codes and agreements, we believe aligning the data could be seen to meeting relevant objective f) Promotion of efficiency in the implementation and administration of the Code, as aligning the code/agreement data will reduce confusion within the industry.

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

None identified

Implementation:

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What lead-time would you wish to see prior to this modification being

implemented, and why?

No lead time is required

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

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