

# Representation

### **Draft Modification Report**

#### 0442 and 0442A:

## Amendment to the implementation date of the Allocation of Unidentified Gas Statement (AUGS) for the 2013/14 AUG year

22<sup>nd</sup> February 2013 Consultation close out date:

enquiries@gasgovernance.co.uk **Respond to:** 

**EDF Energy Organisation:** 

Naomi Anderson Representative:

22<sup>nd</sup> February 2013 Date of Representation:

Do you support or oppose implementation?

**0442** - Support

**0442A** - Support

If either 0442 or 0442A were to be implemented, which would be your preference?

Prefer **0442** 

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

0442

EDF Energy would prefer that modification 0442 was implemented as we feel that this gives adequate time for any questions around the methodology to be resolved. We believe that the methodology laid out by the AUGE is proven to be more robust than the methodology used in previous years. We feel that the costs of unallocated energy should be fairly smeared among industry participants as soon as possible. It is widely recognised that historically domestic customers have picked up a disproportionate amount of unallocated gas.

Are there any new or additional issues that you believe should be recorded in the Modification Report? 0442 and 0442A

EDF Energy have no additional issues we believe should be considered.

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**Relevant Objectives:** 

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EDF Energy believes that this supports the relevant objective of "securing effective competition between relevant shippers"

None

# Implementation:

None

## **Legal Text**:

Yes

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

No

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