



# Representation Draft Modification Report

# Modification Report 0506 0506A Gas Performance Assurance Framework and Governance Arrangements

- 1. Consultation close out date: 12<sup>th</sup> November 2015
- 2. Respond to: <u>enquiries@gasgovernance.co.uk</u>
- 3. Organisation:

Gazprom Energy Bauhaus, 5<sup>th</sup> Floor 27 Quay Street Manchester

- 4. Representative:
   Steve Mulinganie

   Regulation Manager
   stevemulinganie@gazprom-mt.com

   07590 245 256
- **5. Date of Representation:** 12<sup>th</sup> November 2015
- Do you support or oppose Implementation:
   We Oppose implementation of Modification 0506
   We Support implementation of Modification 0506A
- 7. Please summarise (in 1 paragraph) the key reason(s) for your position: We support the introduction of a Performance Assurance Framework and believe that initially it is proportionate to appoint the Transporter Agency (Xoserve) to discharge the Performance Assurance Framework administrator role. We do not see a clear benefit for incurring the additional costs associated with engaging a third party to discharge this role.
- 8. Are there any new or additional Issues for the Modification Report: No
- 9. Self-Governance Statement Do you agree with the status? Not applicable

# **10. Relevant Objectives:**

*How would implementation of this modification impact the relevant objectives?* We agree with the proposer that 0506A is positive for relevant objective (d)





## 11. Impacts & Costs:

*What analysis, development and on-going costs would you face if this modification was implemented?* We have not identified any significant costs associated with this modification

### **12. Implementation:**

*What lead times would you wish to see prior to this modification being implemented, and why?* We would like to see the modification implemented as soon as reasonably practicable

#### 13. Legal Text:

*Are you satisfied that the legal text will deliver the intent of the modification?* We have no comments on the Legal Text provided.

#### 14. 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 emphasise. No.