

Representation
Draft Modification Report 0520 0520A:
Performance Assurance Reporting

Modification Report

1. **Consultation close out date:** 10th March 2016
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:** Gazprom Energy
Bauhaus, 5th Floor
27 Quay Street
Manchester
4. **Representative:** Steve Mulinganie
Regulation & Compliance Manager
stevemulinganie@gazprom-mt.com
07590 245 256
5. **Date of Representation:** 10th March 2016
6. **Do you support or oppose Implementation:**
We **Support** implementation of Modification 520A
We **Oppose** implementation of Modification 520
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
We prefer modification 520A as we believe initially the reporting should be made available via a soft landing so only your company's performance is provided for comparison against the overall aggregate industry performance.

Importantly the formally constituted Performance Assurance Committee (PAC) as part of the Performance Assurance Framework (PAF) will be provided with full information and thus, and subject to appropriate confidentiality arrangements, will allow appropriate oversight and development of suitable remedies as required.
8. **Are there any new or additional Issues for the Modification Report:**
No
9. **Self-Governance Statement Do you agree with the status?**
NA

10. Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the proposer of 520A that it is positive in respect of relevant objective (d) by facilitating reporting of user performance on key industry data that is used for accurate allocation of energy and the appropriate targeting of costs.

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 believe this proposal should be implemented ASAP in line with the formation of the Performance Assurance Committee (PAC)

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.