

## Representation

### Draft Modification Report

#### 0387: Removal of Anonymity from Annual Quantity Appeal and Amendment Reports

**Consultation close out date:** 06 January 2012  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** EDF Energy  
**Representative:** Stefan Leedham  
**Date of Representation:** 06 January 2012

#### Do you support or oppose implementation?

Support

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

EDF Energy generally supports transparency provided that there is no commercially sensitive information that is being published. To this end although we are aware that some Shippers have expressed a view that removal of anonymity would release commercially sensitive information we have not seen a substantive argument that supports this claim. We would also note that it is currently relatively easy to identify which Shipper is associated with which pseudonym. British Gas is readily identifiable as Frankfurt with 11 million supply points and it is possible to identify the other Shippers by mapping traditional PES areas to the corresponding LDZ and associated customer numbers. Through a process of elimination, market structure and publicly available data it is then possible to identify most Shippers with a degree of accuracy. To this end the mod 81 report is less anonymous than some may believe, and removal of anonymity would allow Shippers to resource other functions; however, due to the relative ease of identifying Shippers this would be a marginal improvement equivalent to less than half a day of a FTE resource a year.

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

No additional issues identified.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

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18 November 2011

Version 1.0

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Although we support implementation of this proposal, it is not clear which relevant objectives this proposal would facilitate. In particular we note that the proposer suggests that removal of anonymity would benefit competition by deterring Shippers from not complying with the UNC requirements in the AQ Review and Appeal processes. We have seen no evidence that Shippers are not complying with the UNC requirements in this area, and so it would appear that implementation of this proposal would maintain current practices and so have no impact on competition.

At best it could be argued that there is a resource saving of half a days work if anonymity was removed, but as this is less than £50 per Shipper it is unclear how material a benefit this will have.

### **Impacts and Costs:**

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

Potential saving of less than £50 per year.

### **Implementation:**

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

We support immediate implementation of this proposal so that the next mod 81 data set is published with the pseudonyms removed.

### **Legal Text:**

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

We have not reviewed 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.*

It would be useful to understand how this modification interacts with 378 and whether a separate modification would be required to remove the anonymity from these reports if both 378 and 387 were implemented.