

Representation

Draft Modification Report

Modification 0478: Filling the gap for SOQ reductions below BSSOQ until Project Nexus

Consultation close out date: 21st March 2013

Respond to: enquiries@gasgovernance.co.uk

Organisation: Gazprom Marketing & Trading Retail (GMT&R)
trading as Gazprom Energy

Representative: Steve Mulinganie
Regulation & Compliance Manager

Date of Representation: 21st March 2013

Do you support or oppose implementation?

SUPPORT IMPLEMENTATION

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

We support the proposal as it reinstates the arrangements put in place through 0275 and 0405 both of which have timed out. We would also like to see the ability to apply for a reduction from 1st October 2014 to be available prior to the proposed implementation date of 1st October 2014. This will allow consumers who have been impacted by the falling away of arrangements for winter 2013/14 to go through the administrative processes necessary prior to October so they we can be in a position to enact changes from 1st October 2014.

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

As noted above we would like to be able to apply for a reduction before 1st October 2014 to be available prior to the proposed implementation date of 1st October 2014. This will allow consumers who have been impacted by the falling away of arrangements for winter 2013/14 to go through the administrative processes necessary to be in a position to enact changes from 1st October 2014.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the Proposer that the modification has a positive impact on (a) and (c)

Impacts and Costs:

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

We have not identified any costs as the modification re-establishes existing arrangements

Implementation:

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

As noted we would like to see this proposal implemented ASAP to provide consumers with the assurance that the service will be in place for Winter 2014/15.

Legal Text:

Are you satisfied that the suggested 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.

No.