

Representation - Draft Modification Report 0526S

Identification of Supply Meter Point pressure tier

Responses invited by: **5pm 10 June 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Richard Pomroy
Organisation:	Wales & West Utilities Ltd
Date of Representation:	6 th June 2016
Support or oppose implementation?	Oppose
Relevant Objective:	d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers None

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

Distribution Networks are already making this information available to Suppliers and MAMs. We recognise that this has happened since the modification proposal was first raised and suggest that since the proposer has obtained the result desired then there is no benefit in proceeding with the modification. The only benefit in a formal obligation to provide this information would be if Parties believe that Transporters will cease to provide this information. The information published should reduce the use the GT1 process to obtain pressure tier information. The GT1 process is not recognised in the UNC and no Party has ever raised a modification proposal to put it in the UNC so we cannot see the necessity of codifying the provision of the pressure tier information by post code. If a codified obligation is required then this would be better place in the SPAA (see response to the specific question asked below). Since the industry seems content with the GT1 process arguably a better approach would be to amend the GT1 document (GDN/PM/GT/1 published by the Energy Networks Association) to describe the provision of pressure tier information by postcode. This would have the benefit that the processes associated with obtaining pressure tier information were in one place.

Since the information requested by this modification proposal is already available this modification proposal does not have a positive benefit on any relevant objective.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

We agree that this is a self-governance proposal and there are no material impacts on commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes

Implementation: *What lead-time do you wish to see prior to implementation and why?*

This can be implemented 16 days after a panel vote to implement.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

WWU will incur some cost in the regular quarterly provision of this information but should see a fall in the number of GT1 requests.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes.

Modification Panel Members have requested that the following questions are addressed:

Q1: Respondents are asked to provide views on the impacts to SPAA parties

As the main beneficiaries of this information will be suppliers and MAMs then, if a formal obligation is required, the obligation should be in SPAA which is an agreement between Transporters and Suppliers. This would mean that it covered IGTs as well as large transporters. For the avoidance of doubt since large transporters are currently providing this information we do not believe that a formal obligation is required. Under the Code Governance Review 3 final proposals we believe that this modification proposal would have been identified as a cross code modification and SPAA may well have been identified as the appropriate lead code.

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

Please provide below any additional analysis or information to support your representation: