

## Representation

### Draft Modification Report

#### 0367 - Interruptible to Firm – Supply Point Transition

**Consultation close out date:** 19 May 2011  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** Shell Gas Direct  
**Representative:** Lisa Harris  
**Date of Representation:** 19<sup>th</sup> May 2011

#### Do you support or oppose implementation?

Support

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

Shell Gas Direct agrees that the most effective way to transfer interruptible supply points to firm is for the relevant shippers to reconfirm for 1<sup>st</sup> October.

We also recognise that there is a possibility that some shippers may not reconfirm 100% of supply points by the required date and therefore the transporters need to ensure that any remaining supply points are transferred.

If the proposal to suspend the confirmation window for all Interruptible supply points is the most efficient way of providing the transporters with the capability to register supply points on behalf of users then we support this modification.

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

No

#### Self Governance Statement:

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

Yes

#### Relevant Objectives:

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

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We agree that the implementation will facilitate the achievement of Relevant Objectives F.

To the extent that suspension of the confirmation window impacts competition during this period, and therefore relevant objective D, there is a route to resolve any change of supplier issues that arise between shippers (ISD).

**Impacts and Costs:**

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

Minimal costs, as supply points impacted are already being actively managed through this transition.

**Implementation:**

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

No lead time required as the business is aware of the proposed timeline and there is sufficient time to ensure that potential customer issues are minimised.

**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