

## Representation

### Draft Modification Report

#### 0331: Demand Estimation Section H Changes to Processes and Responsibilities

**Consultation close out date:** 05 September 2011  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** **Corona Energy**  
**Representative:** Richard Street  
**Date of Representation:** 05 September 2011

#### Do you support or oppose implementation?

Support

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

We agree with the proposer that the processes in Section H are overly prescriptive and require to be updated in light of industry changes. To that end we support this modification. It should be noted however that some Shipper organisations are better placed than others to provide expertise to the Demand Estimation process and in light of this we would expect the regulator to scrutinise the outputs from this revised process to ensure that no individual or group of Shippers are unfairly disadvantaged by changes to Demand Estimation processes.

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

No

#### Relevant Objectives:

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

We agree with the proposer that this modification will further relevant objective (d), as it should improve the accuracy of the allocation process, so reducing balancing costs and so improving competition.

#### Impacts and Costs:

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

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Version 1.0

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We would hope that the Demand Estimation process would be improved and so would expect that individual Shipper balancing costs would be reduced.

**Implementation:**

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

It would seem appropriate that this modification is implemented on 01 October 2011 in time for the start of the next gas year.

**Legal Text:**

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

Yes

**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