

## Representation

### Draft Modification Report

#### 0482S – Proposed Changes to Mod 81 Reports to be effective from 01/7/14

**Consultation close out date:** 30 May 2014  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** EDF Energy  
**Representative:** John Costa  
**Date of Representation:** 23 May 2014

#### Do you support or oppose implementation?

Support

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

This modification if implemented would improve the transparency and accurate reporting of AQ amendments. With the implementation of UNC0292 and the AQ amendment tolerance reducing from +/-20% to +/-5%, the number of AQ amendments a shipper has the ability to submit has increased leading to the potential for more than one AQ amendment within the Amendment window which could distort the overall picture of AQ movements. This modification would amend the Mod 81 Reports to report on effective AQ amendments only which is described as the last accepted deemed change. This should produce a more accurate picture of energy movements by LDZ.

#### 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?*

This proposal has the potential to further the relevant objectives d) Securing of effective competition and f) promotion of efficiency in the implementation and administration of the Code.

#### Impacts and Costs:

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

None

**Implementation:**

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

As a self-governance modification as soon as possible but in any case before the 1<sup>st</sup> July to coincide with the first release of the Mod 81 Reports.

**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