

## Representation

### Draft Modification Report

#### 0488S - Additional Changes to the Mod 81 Reports

**Consultation close out date:** 30 May 2014  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** EDF Energy  
**Representative:** James Hill  
**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.

UNC 0488S if implemented, would ensure that changes to the Provisional Annual Quantity would be published alongside the current Annual Quantity (in aggregate) and create separate reporting for large and small supply points. Provision of additional and more granular Annual Quantity (AQ) data to the industry will enable Shippers to better understand the impact of AQ amendment activity which occurred within the AQ Review Process. This will allow for better analysis of AQ data to understand trends, as well as providing more transparency. All of which will lead to improved understanding and confidence in the AQ process as a whole.

#### 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?*

We agree with the Modification Panel's decision that this should be a self-governance modification.

#### Relevant Objectives:

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

As cited in the draft modification report Implementation of UNC 0488S would have a positive impact on Relevant Objectives (f). The proposed changes to reporting will produce a more transparent picture of energy movements by LDZ and market sector when compared against the current Annual Quantity and Provisional Annual Quantity.

#### Impacts and Costs:

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

EDF Energy would face immaterial costs following the implementation of this modification.

**Implementation:**

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

As this is a self-governance modification, implementation could be sixteen business days after a Modification Panel decision to implement. We would welcome an early decision so that UNC 488S could be implemented by 1<sup>st</sup> July 2014 so the report due then will incorporate these changes.

**Legal Text:**

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

We are satisfied that the legal text will deliver the intent of the modification.

**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.