

Representation

Draft Modification Report

0416S: Extending the data provision permissions created by Modification 0279 regarding historic asset and read data provision

Consultation close out date: 07 September 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: First Utility

Representative: Chris Hill (chris.hill@first-utility.com)

Date of Representation: 07 September 2012

Do you support or oppose implementation?

Support

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

The creation of the two proposed Non-Code User Pays services will provide Users with the opportunity to correct data issues with recently acquired sites in a more timely manner than at present. This will then further effective competition between suppliers as a result of the increased appropriate allocation of costs across the industry that implementation of the Proposed Modification will provide.

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?

Implementation would further relevant objective (d) – securing of effective competition between shippers and suppliers.

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Impacts and Costs:

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

We do not believe that we will face any additional costs should the proposed Modification be implemented.

Implementation:

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

The provision made in the proposed Modification is suitable.

Legal Text:

Are you satisfied that the legal text [and the proposed ACS (see www.gasgovernance.co.uk/proposedACS)] 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

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