

Representation

Draft Modification Reports

Modification 0403: EU Third Package – 21 day switching with flexible objection period

&

Modification 0396: EU Third Package – Three Week Switching

Consultation close out date: 2nd March 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: **Gazprom Marketing & Trading Retail (GMT&R) trading as Gazprom Energy**

Representative: **Steve Mulinganie**
Regulation & Compliance Manager

Date of Representation: 1st March 2012

Do you support or oppose implementation?

Mod 0403 – NOT SUPPORT

&

Mod 0396 – SUPPORT

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

Mod 0403 – While we recognise the potential benefits of a flexible window we believe these are negated by the additional complexity that such a regime will create.

We believe this will create confusion for both Suppliers and Consumers when administering such arrangements and therefore on balance we prefer the less complex proposal as set out in Mod 0396.

Mod – 0396 We prefer a fixed set of parameters as set out in the proposal.

As previously noted we believe this will be more straightforward to administer and easily understood by all parties.

We are however concerned that Xoserve will need to carry out the relevant file processing in a timely manner if the Shipper is to benefit from the full 3 Working Day window. Any delay in returning notices to the relevant Shipper could further reduce the window.

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

We believe some assurance is required to ensure Xoserve process transactions forthwith to ensure the 3 Day window is available to Shippers.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree that Implementation of Mod 0396 will better facilitate the achievement of Relevant Objective d.

Impacts and Costs:

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

We would face significant system development changes and revisions to existing processes and procedures.

Implementation:

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

We would like to see a sufficient lead time to reflect the system and process changes required across the industry and note the proposed 12 month minimum lead time suggested.

Legal Text:

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

We have not reviewed the legal text

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