



Gazprom Energy
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Representation

Draft Modification Report

Modification 0429 Customer Settlement Error Claims Process

Consultation Close out date: **7th June 2013**
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: **7th June 2013**

Do you support or oppose implementation?

SUPPORT IMPLEMENTATION

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

We believe the implementation of the proposal will protect parties from the detrimental impact of larger material errors and ensure costs are more accurately targeted. The proposal will close the current disconnect between the end of the reconciliation window and the Limitation Act.

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

No.

Gazprom Energy Response
2013 Version 1.0



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Relevant Objectives:

(How would implementation of this modification impact the relevant objectives)?

We believe the proposal will help ensure that smaller Shippers & Suppliers will be able to manage such large & unpredictable risks which unchecked could act as a barrier to entry and facilitating effective competition.

Implementation:

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

We note the proposed implementation timelines but do not see why the modification cannot be introduced far earlier than the proposed 1st April 2014 date. We would like to see the modification implemented as soon as reasonably practicable

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 you believe should be taken into account or you wish to emphasize.

No

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