

## Representation

### Draft Modification Report

#### 0439: Notice for Enduring Annual Exit (Flat) Capacity Reduction Applications

**Consultation close out date:** 15 April 2013  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** Gazprom Marketing & Trading Limited (GM&T)  
**Representative:** Ric Lea  
**Date of Representation:** 12<sup>th</sup> April 2013

#### Do you support or oppose implementation?

Support

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

GM&T supports this implementation due to the increased flexibility it will offer in controlling operating costs and financial exposure in light of charge volatility and market signals. GM&T is supportive of shippers being able to optimise capacity holdings based on their requirements.

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

None

#### Relevant Objectives:

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

GM&T agrees with the positive impacts laid out in the mod for the relevant objectives.

#### Impacts and Costs:

*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?*

This mod should be implemented prior to the July application window

#### Legal Text:

0439  
Representation  
21 March 2013

Version 1.0

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

None