Representation - Draft Modification Report 0545S Changes to GDN MOD186 Publication dates

Responses invited by: 08 October 2015

To: enquiries@gasgovernance.co.uk

Representative:	Craig Neilson
Organisation:	NGGD
Date of Representation:	07/10/2015
Support or oppose implementation?	Support
Relevant Objective:	f) Positive

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

MOD0186 revenue reports are published and presented to Shippers at the Distribution Charging Methodology Forum on a quarterly basis (currently April, July, October and January each year). The current timetable for MOD0186 report publication is not best aligned to critical information updates that impact on allowed revenues and year ahead unit price changes. The principal updates are the final determination of the Annual Iteration Process via Ofgem, and publication of HM Treasury inflation forecasts, both of which occur in November, and follow very quickly after publication and presentation of the October MOD0186 report. The current timetable means that these important updates are not present to Shippers until the January report and DCMF, which in itself is in very close proximity to publication of final price change notifications. The change to publication timetable proposed by this modification would mean that these updates are presented to Shippers at the earliest opportunity.

Self-Governance Statement: Please provide your views on the self-governance statement.

NGGD support this modification having self-governance status.

Implementation: What lead-time do you wish to see prior to implementation and why?

NGGD will be able to facilitate switching to the new timetable immediately on implementation.

Impacts and Costs: What analysis, development and ongoing costs would you face?

None.

Yes.

Are there any errors or omissions in this Modification Report that you think should be taken into account? Include details of any impacts/costs to your organisation that are directly related to this.

None.

Please provide below any additional analysis or information to support your representation

Legal Text: Are you satisfied that the legal text will deliver the intent of the Solution?

None.