

Representation received by Email

0387: Removal of Anonymity from Annual Quantity Appeal and Amendment Reports

Date: 18 November 2011

Organisation: Regent Gas

Abstract:

We do not support this modification.

Our understanding is that the current provisions for industry **are** applied equally, in that for the AQ appeals and Amendment report disguises the names of all Shippers. This does not stop shippers from taking calculated guesses to work out which disguised name corresponds to which shipper.

For the larger shippers who are publically quoted companies, the size and changes in their supply points / meter point portfolio is in the public domain through their annual report. For those shippers that are private companies who do not need to disclose the size and changes in their portfolio, having this information available to our competitors along with other publically available information such as annual accounts could lead to competitively sensitive information being calculated.

We agree that there is scope for the perception of abuse of the system because of incorrect assumptions. For example our take or pay conditions are more flexible than those of many other shippers so we do attract customers whose AQ are more volatile which leads to a higher degree of AQ amendments.

We also agree that there is no evidence of AQ amendments being manipulated. If anything the AQ we come across when we quote for new business tend to be higher than the actual consumption.

Regards

Deep Valecha

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