

## Representation

### Draft Modification Report

#### 0404 - Profiling payment of LDZ capacity transportation charges for Small Shipper Organisations

**Consultation close out date:** 05 April 2012  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** SSE  
**Representative:** Mark Jones  
**Date of Representation:** 05 April 2012

#### Do you support or oppose implementation?

Not in Support

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

We believe that this modification places increased financial risks on shippers in the event of a default and effectively puts a requirement on transporters to be credit providers. Also, the modification details qualifying criteria that has not been substantiated.

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

No.

#### Relevant Objectives:

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

We do not agree with the proposer that this obligation better facilitates relevant objective d), as it will discriminate to the benefit of smaller shippers, and also will act as a disincentive for smaller shippers to increase their portfolios and go above the threshold limits contained within the modification.

#### Impacts and Costs:

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

None.

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Version 1.0

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**Implementation:**

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

It could be implemented immediately.

**Legal Text:**

*Are you satisfied that the draft legal text (to be provided by Scotia Gas Networks alongside the Draft Modification Report) 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.*

No.