

Representation

Draft Modification Report

0416S: Extending the data provision permissions created by Modification 0279 regarding historic asset and read data provision

Consultation close out date: 07 September 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: **ScottishPower Energy Management Ltd**

Representative: David McCrone

Date of Representation: 07 September 2012

Do you support or oppose implementation?

Support

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

UNC Modification 279 provided shippers with increased visibility of meter read history and meter asset information for meter points which were new to their portfolio and has enabled a more thorough and effective AQ Review process. More accurate AQs lead to a more accurate allocation of transportation charges and energy and therefore help facilitate competition between shippers. This modification extends this by providing this information on a more frequent basis.

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

None that we are aware of.

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

Yes.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

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Version 1.0

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The information within the reports contributes to a more thorough and accurate AQ Review process being undertaken by shippers which in turn leads to the improved allocation of transportation charges. By providing this information on a regular basis throughout the year, rather than just at one point annually, shippers are not restricted in the information that is made available to them depending on when they gain a supply point. This removes an inequity between incumbent and incoming shippers and helps to secure effective competition between relevant shippers and suppliers (Relevant Objective c).

Impacts and Costs:

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

We do not expect any analysis or development costs with this modification. Ongoing costs would be those set out for the provision of the report under User Pays.

Implementation:

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

As this is a self governance modification we would like to see this modification implemented immediately after approval by the Panel.

Legal Text:

Are you satisfied that the legal text [and the proposed ACS (see 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.

No