

Representation - Draft Modification Report UNC 0600S

Amend obligation for the acceptance of EPDQD revisions made after D+5

Responses invited by: **5pm on 09 March 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Terry Burke
Organisation:	Statoil UK Ltd
Date of Representation:	8 th March 2017
Support or oppose implementation?	Comments
Relevant Objective:	d) Positive

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

Statoil UK Ltd provides comments to this modification as we believe the proposed deadline of 10:00 M+15 for submitting revisions may have unintended consequences around late and inaccurate submission of data. We are also aware of a preference for a revision deadline of M+12 from CVSL and feel this would better deliver the overall intent of the solution.

The proposed change for amendments submitted after D+5 to be permitted up to 10:00 on M+15 raises concerns regarding the timeline to submit new data to CVA in the event of such an occurrence. The current deadline for submitting data to CVSL is 12:00 M +15 therefore Statoil UK Ltd feels a more appropriate deadline should be 12:00 on M+12 to enable sufficient time for companies to submit accurate and timely data to CVA. Statoil would also like to make the comment that any revision to an allocation should only apply to a handful of days rather than a longer period received at short notice.

Statoil UK Ltd also notes the discussion around discretion which took place during the workgroup meetings and notes that CVSL currently accept revisions providing individual shippers aren't left worse off. Statoil UK Ltd feels the existing CVSL process works efficiently and questions if the proposed legal text overrides the existing process rather than just codifying it?

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

Agree this is self-governance.

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

Should be ASAP if given approval.

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

None

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

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.*

No

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

N/A