

Representation

Draft Modification Report

0521 - Revision of User Admission Criteria to include Transporter verification of its ability to transact with the Applicant User

Consultation close out date: 16 January 2015
Respond to: enquiries@gasgovernance.co.uk
Organisation: Wales & West Utilities Ltd.
Representative: Richard Pomroy
Date of Representation: 5 January 2015

Do you support or oppose implementation?

Support

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

WWU support this Modification as we agree with the Proposer that this anomaly in UNC drafting should be addressed. Currently the drafting means that a User can meet all conditions required for accession to UNC but then in certain circumstances, beyond the control of the User, they may be unable to make or receive payments as required under Code.

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 agree with the proposer that implementation of this modification would better facilitate Relevant Objective (d) better facilitating effective competition between relevant shippers as it would require verification from the Transporter's account bank that the Applicant User will be able to transact with the Transporter's account bank for amounts payable under the UNC and therefore minimising the risk of socialised bad debt costs being recovered from other Users.

Impacts and Costs:

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

None

Implementation:

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

This modification should be implemented as soon as possible following an Ofgem decision.

Legal Text:

Are you satisfied that the legal text 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.