

Representation

Draft Modification Report

Modification Report Mandating the provision of NDM sample data

1. **Consultation close out date:** 7th September 2018
2. **Respond to:** enquiries@gasgovernance.co.uk
3. **Organisation:** Gazprom Energy
5th Floor
8 First Street
Manchester
M15 4RP
4. **Representative:** Steve Mulinganie
Regulation Manager
stevemulinganie@gazprom-mt.com
0799 097 2568
5. **Date of Representation:** 4th September 2018
6. **Do you support or oppose Implementation:**
We **Support** implementation of the Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**
We support the introduction of a mandatory NDM sample as this will help improve demand modelling and thus more accurately target the allocation of unidentified gas.
8. **Are there any new or additional Issues for the Modification Report:**
No
9. **Self-Governance Statement Do you agree with the status?**
Yes

10. Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We **agree** with the proposer that this modification is positive in respect of Relevant Objective **(d) & (f)**

11. Impacts & Costs:

What analysis, development and on-going costs would you face if this modification was implemented?

We **have not** identified any significant costs associated with this modification

12. Implementation:

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

We believe sufficient time should be given to allow parties time to put in place suitable arrangements i.e. developing reports in the agreed format. To this end we would expect a **minimum 3 months lead time** for development.

13. Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

We have **no** comments on the Legal Text provided.

14. Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or you wish to emphasise.

No