

## Representation

### Draft Modification Report

#### Modification UNC 0721 (Urgent) Shipper submitted AQ Corrections during COVID-19

1. **Consultation close out date:** 27<sup>th</sup> April 2020
2. **Respond to:** [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)
3. **Organisation:** Gazprom Energy  
5<sup>th</sup> Floor  
8 First Street  
Manchester  
M15 4RP
4. **Representative:** Steve Mulinganie  
Regulation Manager  
[stevemulinganie@gazprom-mt.com](mailto:stevemulinganie@gazprom-mt.com)  
0799 097 2568 / 0751 799 8178
5. **Date of Representation:** 26<sup>th</sup> April 2020
6. **Do you support or oppose Implementation:**  
We **Support** implementation of our Modification
7. **Please summarise (in 1 paragraph) the key reason(s) for your position:**  
We believe many sites AQ's will be too high during the Pandemic as a result of the mandatory shutdown of businesses. It is also the case that for some sites ramping up production to help fight COVID 19 the current AQ's may be too low. The solution provided allows AQ's to be amended quickly and effectively by utilising existing processes
8. **Are there any new or additional Issues for the Modification Report:**  
No
9. **Self-Governance Statement Do you agree with the status?**  
NA

#### 10. Relevant Objectives:

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

As noted in our Modification Shippers have obligations under license to ensure that its offtakes of gas from a transporter's pipe-line system and its deliveries of gas are equal. This modification will improve energy allocation, so reducing costs in the market and hence furthering competition.

#### 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?*

Owing to the continuing negative impact of inaccurate AQs on the market, this change needs to be implemented as soon as possible

#### 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.*

We would note the continuing demand destruction in the Non Domestic market and the latest data from ICoSS estimating this to be in the overall range of 20-25%.