

Representation Draft Modification Report

Modification 0734S Reporting Valid Confirmed Theft of Gas into Central Systems and Reporting Suspected Theft to Suppliers

1. **Consultation close out date:** 18th January 2022
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 / 0751 799 8178
5. **Date of Representation:** 18th January 2022
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:**
The Modification seeks to ensure that Supplier Reported theft energy values are reflected in UNC Settlement. The Modification provides for Shippers to be able to object on the grounds of material error thus ensuring appropriate oversight is in place.
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 believe that this modification is positive in respect of Relevant Objective (d)

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 the implementation of this modification

12. Implementation:

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

ASAP

13. Legal Text:

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

We **have not** reviewed 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