

Representation

Draft Modification Report

0425: Re-establishment of Supply Meter Points – Shipperless sites

Consultation close out date: 15 April 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: National Grid Transmission
Representative: Dave Corby
Date of Representation: 15 April 2013

Do you support or oppose implementation?

On balance we support the implementation of this proposal.

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

We agree with the principle of the Modification that it is appropriate to retain the obligation on the last registered Shipper to resolve sites which have been subject to Effective Supply Point Withdrawal or Isolation but which remains capable of flowing gas.

However we also believe that to an extent the Proposal legitimises the shipper/supplier actions (or non-action) which generates "shipperless" sites and as such inadvertently perpetuates (and to an extent legitimises) a recognised inefficiency of the current regime, which we consider is contrary to the Relevant Objectives of securing effective competition between Shippers and between Suppliers and the efficient operation of the relevant transporter's system.

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 that the Modification may have a positive benefit on Relevant Objective (d) "Securing of Effective Competition Between Relevant Shippers".

Impacts and Costs:

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

None.

Implementation:

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

None.

Legal Text:

Are you satisfied that the legal text [and the proposed ACS (see www.gasgovernance.co.uk/proposedACS)] 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.