

## Representation

### Draft Modification Report

#### 0451V 0451AV: Individual Settlements For Pre-Payment & Smart Meters

**Consultation close out date:** 08 January 2014

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** British Gas

**Representative:** Andrew Margan

**Date of Representation:** 06 January 2014

#### Background to this consultation

The consultation is aimed at establishing if the content/effect of the variations have caused you to change a view that you previously expressed, or to take a view that you had not previously considered.

#### Do you support or oppose implementation?

**0451V** - Not in Support

**0451AV** - Not in Support

#### If either 0451V or 0451AV were to be implemented, which would be your preference?

Prefer **0451AV**

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

British Gas' position has not changed from the view previously expressed.

Our concerns with both proposals are that the sample size for the new profile is too small and too specific to a single LDZ. We are concerned this change has bypassed DESC industry procedures, where new profiles should be created. The new profile data is unavailable for review, so it cannot be verified, if this change will deliver the proposer's intentions or if the new profile is accurate.

Because of the lack of evidence and the bypassing of industry agreed procedure, we strongly recommend that DESC is able to review the new profile, before any change is implemented. Otherwise the risk is the change could result in the proposal delivering unintended consequences.

Regarding 451V it contains retrospective elements. We believe the required high bar of evidence and proof has not been met. Approval of this change will result in a windfall for some organisations after the settlement period has closed out.

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Version 1.0

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**Are there any new or additional issues that you believe should be recorded in the Modification Report?**

No

**Relevant Objectives:**

*How would implementation of these modifications impact the relevant objectives?*

This proposal will benefit shippers with prepayment portfolios only.

**Impacts and Costs:**

*What analysis, development and ongoing costs would you face if either of these modifications were implemented?*

Minimal system and process changes are expected.

**Implementation:**

*What lead-time would you wish to see prior to either of these modifications being implemented, and why?*

Unknown

**Legal Text:**

*Are you satisfied that the legal text and the proposed ACS (see [www.gasgovernance.co.uk/proposedACS](http://www.gasgovernance.co.uk/proposedACS)) will deliver the intent of the modifications?*

No issues have been identified

**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.*

None