

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: EDF Energy

Representative: Jonathan Kiddle

Date of Representation: 07 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?

We do not support either modification.

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

Our position has not changed in light of the revised modification proposals.

We do not believe that the evidence provided is statistically robust enough to justify the adoption of new profiles for all pre payment meters. Furthermore, we still believe the cost of these modifications to the whole industry will outweigh the perceived short-term benefit to one sector of the industry.

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?

We do not think that the modifications meet any of the relevant objectives.

0451V 0451AV

Representation

07 January 2014

Version 1.0

Page 1 of 2

© 2014 all rights reserved

Impacts and Impacts and Costs:

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

There will be significant ongoing costs to industry associated with systems development, producing the report and validating the adjustment invoices. These developments will become redundant once Project Nexus is implemented.

Implementation:

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

We do not support the modification proposals.

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 modifications?

We have not reviewed the legal text.

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.