

## Representation

### Draft Modification Report

#### 0463S - Recognition of the '2nd January' Scottish Bank Holiday as a Business Day for Supply Point related transactions

**Consultation close out date:** 27 January 2014  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** SSE  
**Representative:** Kristian Pilling  
**Date of Representation:** 24 January 2014

#### Do you support or oppose implementation?

Support

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

Using the 2<sup>nd</sup> January as a business day for automated SPA systems efficiently circumvents a barrier to a timely and accurate change of supplier process. By maximising the opportunity to object by reducing the possibility for 4 non-business days due to bank holidays in the 21 calendar day registration period, we are minimising the risk of erroneous transfers. We know that when consumers experience uncertainty and complications when switching supplier it acts to deter consumer engagement with the market and as such depreciates the value of competition.

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

No

#### Self Governance Statement:

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

Yes

#### Relevant Objectives:

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

Relevant objective (f) is positively impacted. Improving the ability to complete the change of supplier process across the year will reduce the risk of erroneous transfers taking place as well as the associated corrective actions, therefore promoting efficiency in the implementation and administration of the Code.

0463S  
Representation  
27 January 2014

Version 1.0

Page 1 of 2

© 2014 all rights reserved

**Impacts and Costs:**

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

The analysis required to implement this modification has been completed. No development or ongoing costs as it concerns a minor change in loading relevant business days for our system in 2015.

**Implementation:**

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

We support implementation in the code in 16 days of Panel approval. This will ensure it is effective for 2<sup>nd</sup> January 2015.

**Legal Text:**

*Are you satisfied that the legal text 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