

Representation

Draft Modification Report

0472S: Restricting the number of registration attempts by a supplier

Consultation close out date: 08 August 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: British Gas Trading Ltd
Representative: Andrew Margan
Date of Representation: 04 August 2013

Do you support or oppose implementation?

Support

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

British Gas recognises that there are instances where a customer is under contract and although a registration request is rejected, the new shipper repeats the registration request over and over again.

Whilst code is silent on how many registration attempts are permitted, the new shipper keeps trying to register the customer without doing anything to resolve why the request is being rejected. This practice is an inefficient use of industry resource and does not result in a positive customer experience.

Unlike the original proposal, the final modification proposal does not restrict the number of registration attempts, but provides the legal framework for Xoserve to provide the relevant information to the incumbent shipper, which enables them to open a dialog with the requesting shipper (or Ofgem).

As this is an improvement on the current arrangements, we support this change.

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

None identified

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We believe this change meets relevant object D: Securing of effective competition. By potentially reducing the number of erroneous gain attempts to an appropriate level, all shippers (and their suppliers) will be able to manage their resources more efficiently and we believe this will have a marginal benefit in maintaining competition between shippers.

Impacts and Costs:

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

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None identified

Implementation:

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

As soon as possible

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.

Whilst this change tries to address shippers who raise repeated registration attempts and it is a positive step to address the issue, we are concerned that those offending shippers may not change their behaviour appropriately, which could mean a further change to address the issue is required.