

## Representation

### Draft Modification Report

#### 0472S: Reporting the number of registration attempts by a supplier

**Consultation close out date:** 08 August 2013  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** RWEpower  
**Representative:** Edward Hunter  
**Date of Representation:** 07 August 2014

#### Do you support or oppose implementation?

Support

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

The current process enables a Shipper to make repeated registration attempts for a site. This impacts on the registered user who must provide a valid objection code. Responding to repeated attempts at registration require time, resource and have detrimental commercial impacts on the registered Shipper.

The lack of transparency in the process means that the registered Shipper has no way of identifying the Shipper who may repeatedly attempt to register a site. This modification will add an additional User Pays telephone service whereby the registered Shipper can contact Xoserve to identify the proposing Shipper and then resolve the situation through a bilateral agreement between Shippers or escalate to Ofgem where a systematic behaviour is believed to have been identified.

#### 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?*

- d) Securing of effective competition:
- (i) between relevant shippers;
  - (ii) between relevant suppliers; and/or
  - (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.

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Representation

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Version 1.0

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By reducing the level of erroneous gain attempts increases resource efficiency amongst Shippers leading to a more effective competitive environment for Shippers.

f) Promotion of efficiency in the implementation and administration of the Code.

Reducing the number of erroneous gain attempts would enable Shippers to focus on genuine supply point registrations promoting efficiency.

**Impacts and Costs:**

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

None

**Implementation:**

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

As soon as is practicable.

**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