

Representation - Draft Modification Report 0551

Protecting consumers who are disaggregated under Modification 0428 from Ratchet charges for Winter 2015

Responses invited by: **05 November 2015**

To: enquiries@gasgovernance.co.uk

Representative:	EDDIE PROFFITT
Organisation:	MAJOR ENERGY USERS COUNCIL
Date of Representation:	23 RD OCTOBER 2015
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

We are already seeing members adversely affected by disaggregation resulting in meeting between them and their Distribution Network to try to resolve the allocation of load between meters. Until historical data is available to confirm their actual AQ and SOQ no penalties should be applied as this would be an unintended consequence of the original modification.

Implementation: What lead-time do you wish to see prior to implementation and why?

immediate

Impacts and Costs: What analysis, development and ongoing costs would you face?

none

Legal Text: Are you satisfied that the legal text will deliver the intent of the Solution?

Are there any errors or omissions in this Modification Report that you think should be taken into account? Include details of any impacts/costs to your organisation that are directly related to this.

Please provide below any additional analysis or information to support your representation