

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: E.ON
Representative: Colette Baldwin
Date of Representation: 21st July 2014

Do you support or oppose implementation?

Support

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

When it's clear that a customer is in a valid contract and that the current Registered User has the right to object to the transfer of supply under that contract, it is unreasonable that the incumbent Shipper should repeatedly be the subject of invalid transfer requests. This places a cost burden on the Shipper who has to manage the repeated requests and there is no process within the code currently for the incumbent Shipper to engage with the Proposing User, in fact the incumbent doesn't have the identity of the Proposing User. This proposal facilitates a mechanism for the identity of the proposing user to be disclosed if a pattern of behaviour has been identified. The incumbent shipper may then contact the proposing User to ask them to desist, or may escalate the matter to Ofgem.

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?

Relevant Object F: This proposal enables the identity of a proposing User to be disclosed to the incumbent shipper, where they are the subject of repeated and invalid transfer request, providing certain conditions are met. This will enable the incumbent shipper to enter into a dialogue to stop the inappropriate transfer requests, or to escalate the behaviour to Ofgem. This should help stop repeated systematic requests for supply point transfer where a valid contract exists and transfer isn't possible.

Impacts and Costs:

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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?

We would like to see this implemented as soon as possible, there are no system or process impacts that would take time to set up.

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