

Representation - Draft Modification Report 0569S

Removal of the minimum security requirement from the Energy Balancing Credit Rules

Responses invited by: **11 February 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Paul Bedford
Organisation:	Opus Energy Limited
Date of Representation:	26/01/16
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

We support the proposal to remove the current arbitrary minimum figure of £10,000 security as used to avoid outstanding costs being recovered from other Users in the case of default. As stated by the Proposer, we agree that this minimum level of security acts as a barrier to entry for smaller Users in particular, and so hampers competition.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

We agree with the Panel's determination that the criteria for Self-Governance are met as this modification is not expected to have any significant material impact.

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

As soon as possible following a decision by the Panel.

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

Positive impact, with no implementation costs.

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

Yes.

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.*

No

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

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