

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:	Kiran Samra
Organisation:	RWE npower
Date of Representation:	4 th November 2015
Support or oppose implementation?	Support
Relevant Objective:	d) Positive

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

RWE npower is in support of this change as it allows customers and Shippers with relevant DM supply points the benefit of a soft landing for a single supply meter point where previously this had been part of an aggregated Supply Point. This modification will allow appropriate notice to be provided to the Shipper and customer as to the potential impact of ratchets for the following year if the capacity requirement is not accurately recorded.

The ratchet charges will incentivise customers to book the correct capacity at a site and will also allow the network to book the required capacity and manage demand. Modification 428 Single Meter Supply Points has led to the creation of a large number of “new” single metered supply points and some of these will fall within scope of the Ratchet regime for winter 2015/16. This modification also offers a time-limited safety net for customer’s whose overall capacity hasn’t changed post disaggregation, but may have been inaccurately apportioned across their meter points following the disaggregation.

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

RWE npower agree that the implementation date for this modification should be the 1st October 2015

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

The change itself is there to protect the consumer and if costs were incurred these can be refunded as necessary.

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

No