

Representation

Draft Modification Report

0431: Shipper/Transporter – Meter Point Portfolio Reconciliation

Consultation close out date: 12 December 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: Co-Operative Energy
Representative: Chris Hill
Date of Representation: 11 December 2013

Do you support or oppose implementation?

Support

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

We believe that the proposal is appropriate as implementation should potentially provide a clearer view of the number of unregistered, dead and duplicate meter points. This should then have a direct benefit in terms of calculation of the size of unidentified gas in the market and lead to more accurate charging, which will then benefit competition.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

No.

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should not be a self-governance modification?

Yes.

Are you in agreement with the decision to remove the Self-Governance status from this modification? If not, please state reasons why.

We believe this is appropriate as implementation would be expected to have a direct, and as yet uncertain, financial impact upon Users.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We believe that implementation would be expected to further relevant objectives d) i) and ii) securing of effective competition between relevant shippers and suppliers.

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Version 1.0

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Impacts and Costs:

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

We would expect these to be minimal.

Implementation:

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

We feel that the proposed implementation timescales laid out in the draft modification report are appropriate.

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.