

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: RWE npower
Representative: Richard Vernon
Date of Representation: 10 December 2013

Do you support or oppose implementation?

Not in Support.

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

RWE npower fully understands and appreciates the impact of unidentified gas on the market and customer base. We agree with the intent of the proposer. However, there is insufficient evidence to suggest the benefit of this proposal will exceed or even equal the cost of developing and administering this solution (highlighted in the cost section). Without such, disproportionate cost may be borne by the customer.

Business Rule 2 states: 'The data extract will be sourced from suppliers customer database supply.' This is straightforward for RWE npower with an integrated 1-2-1 supplier/shipper relationship. Where a supplier has multiple shipper relationships, which party will report on any MPRNs without a shipper? In this scenario, a supplier billing shipperless / unregistered sites has no link to the UNC and therefore this proposal.

We believe the issue of unregistered & shipperless MPRNs is most effectively managed through the ongoing Xoserve workstream and the recently agreed measures to mail drop and visit consumer premises. This workstream will create visibility of MPRNs which require registration by shippers. PAF measures, specifically linked to the 0410A and 0424 modifications could further decrease or remove new instances.

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

It would be of benefit to the market to have visibility of MPRNs not on shipper portfolios but present in sites and meters. This would go some way to offset our concerns over benefit of this modification.

Self Governance Statement:

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

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

Yes, as there is a material impact to shippers / suppliers.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

No comment.

Impacts and Costs:

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

1. Development of the shipper/supplier report.
2. IT solution to accept transporter initiated registrations.
3. Process and training impacts to sales, registrations and portfolio teams.
4. Management of queries arising from the portfolio comparison. We believe there is the potential to create a large number of queries as a result of the proposed modification.

Implementation:

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

Our systems will not accept enforced registrations (as above). This development could take 24 months, depending on the final implemented solution.

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.