

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: ScottishPower Energy Management Ltd
Representative: Marie Clark
Date of Representation: 10 December 2013

Do you support or oppose implementation?

Support

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

We support this Modification as we believe that it represents a further positive step towards industry attempts to reduce the number of Shipperless and unregistered sites. In addition we believe that the outputs from the reconciliation of Transporter and Shippers/Supplier meter point portfolios has the potential to have a positive impact on the data cleansing exercise which is currently being undertaken to align industry data in preparation for migration to the replacement UK Link system.

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

None identified

Self Governance Statement:

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

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

We are in agreement.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We believe that implementation of this Modification will positively impact Relevant Objective (d) *Securing of effective competition:*

- (i) *between relevant shippers;*
- (ii) *between relevant suppliers;*

We are of the view that implementation of this Modification will assist in identifying misalignments between Shipper/Supplier and Transporter portfolio statements. Should any misalignment be identified, shippers will be given adequate opportunity to investigate

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and if appropriate, process the registration of sites prior to any intervention by Xoserve to automatically register the sites. Removal of specific sites from the Shipperless and Unregistered pot will have positive benefits on settlements accuracy by ensuring that energy and transportation costs are directly attributable to the correct Shippers. As a consequence it will reduce the burden experienced by Shippers from the allocation of unidentified gas volumes estimated by the AUGÉ.

Impacts and Costs:

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

There would be costs associated with extracting data from our billing system/registration system in order to meet the requirements of this Modification.

Implementation:

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

As per Modification

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.

We have no additional comments.