

## 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:** British Gas  
**Representative:** Andrew Margan  
**Date of Representation:** 12 December 2013

#### Do you support or oppose implementation?

Qualified Support

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

British Gas supports this proposal because it helps address the issue of Shipperless and Unregistered sites.

Shippeless and Unregistered sites can be caused when a consumer contracts with a supplier, and through the relevant shipper, for whatever reason, the supply is not registered. This can result in industry parties not incurring the correct Energy and Transportation costs, which can distort competition.

This proposal will allow the Transporter to compare the industry Supply Meter Point registrations with the industries actively supplied customer portfolios. Any discrepancies can be raised with the relevant party and rectified by the party or the Transporter.

We believe this will better align the relationships between the customer, the supplier, the shipper and the transporter; and ensure costs are more appropriately allocated throughout the industry.

#### 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?*

We believe that this change could have a material impact to industry parties and as a result it no longer meets the Self Governance criteria and therefore the change should be sent for authority decision.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

We believe this proposal will better allocate costs to the correct industry parties. Better cost allocation between parties will better facilitate competition.

#### Impacts and Costs:

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

We have identified system and process changes will be required.

Depending on the output of the comparison report, we believe several FTEs will be required to investigate and manage the exceptions.

**Implementation:**

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

We believe a minimum of 3 months will be required prior to implementation for recruitment, system and process changes.

**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 understand from the proposal and Workstream discussions that our customer portfolio data will be used for the purpose of the comparison report and not for any other purpose.

We would like to clarify that we have not given authorisation for this data to be used for any other purpose other than that set out in Modification 431. We would consider any other use of this data, without permission a breach of the UNC Code.