

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: Scotland and Southern Gas Networks
Representative: David Mitchell
Date of Representation: 12 December 2013

Do you support or oppose implementation?

Support

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

As the proposer of this modification SGN are in support of implementation as we believe that this modification will help to improve the accuracy of the data that is held in the Supply Point Register. This modification has the potential to resolve a large number of sites that are currently shipperless or unregistered which will improve the allocation of gas to market participants. SGN believes that this modification goes some way to delivering an industry solution to the shipperless and unregistered sites issue without the need to involve end users. Without this modification end users may be sent letters asking them to register a supply for which they already have a supply contract, and may be paying a gas bill. In our opinion contacting end users when a solution can be had by the sharing of information held within the industry does not make for a good customer experience.

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?

SGN agrees that this modification should not be self governance due to the material changes that were made by the workgroup to the business rules during the development of this modification.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

The implementation of this modification will further relevant objectives C & D as this modification would be expected to reduce the number of unregistered sites and increase the accuracy of data held by Xoserve. Implementation of this modification may mean

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that there is consequently less unidentified gas and as a result costs would be more appropriately allocated. By reducing the number of unregistered sites the Transporters will be able to allocate their resources effectively to resolving those sites that remain unregistered and may be using gas without a valid supply contract.

Impacts and Costs:

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

Minimal impact and costs are expected.

Implementation:

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

We will be aiming to have this modification implemented by the 01 May 2014 pending an authority decision.

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.