

Representation

Draft Modification Report

0455S - Updating of Meter Information by the Transporter

Consultation close out date: 21 March 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: SSE
Representative: Mark Jones
Date of Representation: 21 March 2014

Do you support or oppose implementation?

Not in Support

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

This modification goes against the fundamental principle that Users should be responsible for the data held by the Transporters' agent on the Supply Point Register, whether directly populated by the User or via updates made by agents with whom they have commercial arrangements in place. The data should not be allowed to be amended by Transporters on whom there is no commercial impact if the data is updated incorrectly. Users incur the costs that result from data held on the Supply Point Register including transportation charges and gas allocation costs.

We believe that any errors identified by Transporters could be reported via the Performance Assurance regime which is currently being developed.

Modification Panel Members have indicated that it would be particularly helpful if as part of the consultation process views could be provided on the Workgroup's recommendation that the self-governance status should be reviewed.

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

No, we do not agree that this should be a self-governance modification. If Transporters are allowed to update meter information on the Supply Point Register then it will affect Users' charges and also change gas allocation. This, we believe, should not allow the modification to be self governance as there would be a material impact on Users as a result of the modification. Furthermore, if Transporters update the information incorrectly then there is no comeback on them for the error caused and no form of recompense to Users. This modification will impact competition between Users and also may impact the commercial arrangements between Users and third parties. The modification also proposes to levy charges on Users and so, for this reason also, it should not be self-governance.

0455S
Representation
21 February 2014

Version 1.0

Page 1 of 2

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

No.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We do not believe that implementation of this modification would positively impact any of the relevant objectives. It is likely to negatively impact relevant objective d) Securing of effective competition, as it will create uncertainty around charges in that Users are ultimately not fully subject to charges based on data that either they or their agents have provided.

Impacts and Costs:

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

SSE would incur potentially quite large development costs as we would have to receive and load new flows and to validate any changes made by the Transporters. New business processes would have to be created.

Implementation:

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

We would like to see an implementation timescale of at least 6 months as changes to our systems and processes will be required.

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.