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National Gas Emergency Service - 0800 111 999* (24hrs)
*calls will be recorded and may be monitored

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10th April 2014
Your Reference:UNC Modification Proposal 0477

UNC Modification Proposal 0477 - Supply Point Registration - Facilitation of Faster Switching

Dear Bob,

Thank you for your invitation seeking representations with respect to the above Modification Proposal for which National Grid Gas Distribution (NGD) would like to support.

Do you support or oppose implementation?

Support

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

NGD believes that while consumer switching is primarily concerned with supplier to supplier activity, it is important that if changes are made to the transfer process, then, where relevant, corresponding amendments are made to change of shipper arrangements set out within the UNC. We are conscious that speed of consumer switching has been under recent scrutiny by the government and that the industry is under challenge to seek reductions in the overall Supply Point transfer timescales. Mindful of this and the potential customer benefits that a more rapid transfer of Shipper ownership can bring we are supportive of the measures identified within this Modification Proposal.

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

We have not identified any such issues.

Self Governance Statement:

We agree that this Modification Proposal should not be subject to self-governance procedures given its material effect on consumers.

Relevant Objectives:

Relevant Objective d) Securing of effective competition:

- (i) between relevant shippers;
- (ii) between relevant suppliers; and/or
- (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.

NGD concurs with the comments in the Draft Modification Report; specifically that the modification would facilitate a reduction in the timeframe for the change of supplier, thereby providing benefits for consumers as they will be able to change their supplier more rapidly than under the present arrangements.

We agree that a quicker 'change of supplier' process is likely to increase consumer confidence and engagement in the change of supplier process.

Impacts and Costs:

We concur with the statement in the Draft Modification Report concerning the funding of this Modification Proposal and we have no further comment in this respect.

Implementation:

We note the aspiration for a quarter 4 of 2014 implementation of this Modification Proposal. This is contingent of the timely development and implementation of changes to the UK-Link system.

Legal Text:

NGD is satisfied that the legal text as published by the Joint Office within the Draft Modification Report meets the requirements of the Modification Proposal.

Is there anything further you wish to be taken into account?

We have no further comments.

We trust that this information will assist in the compilation of the Final Modification Report. Please contact me on 01926 653541 (chris.warner@nationalgrid.com) should you require any further information.

Yours sincerely,

Chris Warner
Network Code Manager, Distribution