

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: RWEnpower
Representative: Edward Hunter
Date of Representation: 20 March 2014

Do you support or oppose implementation?

Not in Support

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

The responsibility for meter information does not rest with the Gas Transporter, Gas Shipper or Supplier. It is the responsibility of the relevant Meter Asset Manager governed by the commercial contracts that a Shipper/Supplier has in place.

Any change to this data will not impact Transporters but may have significant impact on Shippers, Suppliers and the consumer.

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?

RWEnpower does not believe that this modification fulfils the criteria of a Self Governance modification. For the following reasons:

- It imposes a levy on parties for the Transporter to perform a service and therefore has commercial impacts.
- It changes data that impacts a Shipper's settlement position thus impacting transportation charges which has a commercial impact
- It requires an Agency Charging Statement to be raised by Xoserve and will be funded by the industry.
- It has the potential to change gas allocation
- May affect a third party MAM under a commercial contract with a Shipper and restrict their ability to recover asset costs.

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

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Version 1.0

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Data quality is an important industry issue with a number of initiatives underway. We are of the opinion that this perceived issue should be addressed by the Performance Assurance Workgroup.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We do not believe it fulfils any of the relevant objectives and actually negatively impacts competition.

Impacts and Costs:

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

This modification may expose a Shipper to inaccurate costs and extra administration to resolve issues.

Implementation:

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

If this modification were to be implemented we would like to see a lead time of at least 6 months.

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.