

Representation

Draft Modification Report

0477 - Supply Point Registration - Facilitation of Faster Switching

Consultation close out date: 10 April 2014
Respond to: enquiries@gasgovernance.co.uk
Organisation: RWE npower
Representative: Andy Baugh
Date of Representation: 9th April 2014

Do you support or oppose implementation?

Support

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

Npower supports quicker switching and the positive benefits it will bring to the energy industry and its customers. The proposal will shorten the switching process, increase competition within the energy market and allow customers to realise the benefits of their new chosen product sooner.

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

No.

Relevant Objectives:

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

We believe this modification will impact 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.

Shortening the switching timescale should encourage switching within the energy market bringing greater competition.

Impacts and Costs:

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

Implementation of this modification, and quicker switching as a whole, will impact the systems and processes across our Domestic, SME and I&C portfolio at a significant cost. Systems managing registration, agent interaction, customer contract and customer correspondence will be assessed and updated where necessary.

Implementation:

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

Npower are supportive of delivering quicker switching in Q4 2014, however, we believe the primary focus should be on delivering the project in a stable form which does not compromise customer experience. Therefore this modification requires urgent approval to allow industry wide system and process changes to be understood with sufficient time to make necessary changes.

Legal Text:

Are you satisfied that the legal text and the proposed ACS (see www.gasgovernance.co.uk/proposedACS) 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.

As stated above, an urgent approval of this modification is required to enable systems to be updated in time to meet the deadline.