

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: British Gas Trading
Representative: Andrew Margan
Date of Representation: 20 March 2014

Do you support or oppose implementation?

Qualified Support

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

British Gas understands that this modification seeks to allow Transporters to update asset information on behalf of shippers, if following a notification they fail to update the assets details themselves.

As correct asset details are linked to the Transportation Capacity charges, we support changes which improve accurate capacity cost allocation. Also improved asset details should lower customer query costs.

It may be noted that this modification risks applying the wrong asset information to a User. This could lead to a dilution of data quality and incorrect charging.

We believe this risk can be mitigated, providing a robust communication method is developed, to ensure shippers receive adequate notifications and that errors made can be corrected quickly and without detriment to shippers.

Current notifications from the Transporter are routinely issued through the Contact Management System (CMS). Unlike its predecessor, Conquest, CMS often only allows single notifications to flow through to individual users in Supplier/Shipper organisations. This makes analysis and bulk correction of data impossible and progress extremely difficult to track, which risks flows being missed.

Therefore the communications method as part of this modification needs to be developed for us to support this change.

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?

Regarding Self Governance we believe this change could have a material impact to Users.

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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?

Accuracy and timely updates in respect of Meter Information recorded on the Supply Point Register will potentially cause fewer billing related problems for User, Suppliers and consumers, particularly those who are changing supplier, thereby:

d) Securing of effective competition:

(i) between relevant shippers;

(ii) between relevant suppliers

Impacts and Costs:

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

We support the User Pays cost recovery approach.

Implementation:

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

Providing the communication method is clearly communicated to shippers we can support a 60 day implementation timescale.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

We believe the text supports the mod

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