

Representation - Draft Modification Report 0526S Identification of Supply Meter Point pressure tier

Responses invited by: **5pm 10 June 2016**

To: enquiries@gasgovernance.co.uk

Representative:	Andrew Margan
Organisation:	British Gas Trading
Date of Representation:	10 June 2016
Support or oppose implementation?	Oppose
Relevant Objective:	d) Positive

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

We support the intent of this proposal, which is to reduce aborted meter visits by publishing industry pressure tier information. The concept is fewer aborted visits improves the consumer appointment process and should result in cost savings which can be passed through to suppliers and their customers.

Our objection is Transporter costs to provide the service are undefined. Proposal cost are required to assess the change and enables shippers to manage and protect their customers. Not providing this information creates a dangerous precedent and we believe the proposal should not be progressed until the full Transporter costs are provided.

Self-Governance Statement: *Please provide your views on the self-governance statement.*

We believe this proposal creates a cross subsidy between shippers who pick up the UNC modification costs and MAPs and MAMs who will benefit from the proposal. As MAP and MAM operations differ across the industry, it does not necessarily follow that these costs are applied to the correct industry parties and their customers. As this creates a distortion within the market, we believe Ofgem should arbitrate over such a decision and therefore we do not believe self governance is appropriate.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

No lead time is required

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

No internal costs have been associated with the implementation of this proposal.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Yes

Modification Panel Members have requested that the following questions are addressed:

Q1: Respondents are asked to provide views on the impacts to SPAA parties

The impact to British Gas as a supplier and a MAM is that we have the opportunity to access pressure tier information to better manage site visits and avoid aborted visits. Retrieving the information will be time consuming, unless internal systems are developed. System development cost, may restrict our use of the data.

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

Transporter costs need to be provided.

Please provide below any additional analysis or information to support your representation:

N/A