

Representation

Urgent Modification Proposal

0405: Bottom Stop SOQ Appeal Mechanism for 2011/12

Consultation close out date: 01 December 2011

Respond to: enquiries@gasgovernance.co.uk

Organisation: British Gas Trading Limited

Representative: Chris Wright

Date of Representation: 29 November 2011

Do you support or oppose implementation?

Support

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

Having raised this modification proposal we remain convinced that it needs to be implemented as a matter of urgency so as to serve the needs of consumers who might be faced with unnecessarily high transportation charges as a result of unreasonably restrictive Bottom Stop SOQ requirements.

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

There are no new issues we wish to add.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

As we have stated in the modification proposal.

Impacts and Costs:

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

Only a very small administrative cost.

Implementation:

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

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Implementation should be within the timescales recommended in the proposal in order to permit an "appeal" to be considered as part of the current capacity reduction window.

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.

We believe the proposal has a clear focus on consumer needs.

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