

Representation

Draft Modification Report

0450 0450A 0450B - Monthly revision of erroneous SSP AQs outside the User AQ Review Period

Consultation close out date: 12 December 2013

Respond to: enquiries@gasgovernance.co.uk

Organisation: Co-Operative Energy

Representative: Chris Hill

Date of Representation: 11 December 2013

Do you support or oppose implementation?

0450 – Qualified Support

0450A - Qualified Support

0450B - Support

If either 0450, 0450A or 0450B were to be implemented, which would be your preference?

Prefer 0450B

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

Currently, Users are unable to amend the AQs of SSPs outside the User AQ Review period. This means that smaller Users who are less able to bear the cost of erroneous AQs are disproportionately affected, and may have to pay inaccurate costs as a result of these for a potentially significant time period. We believe that the implementation of any of the three proposed modifications will go some way towards resolving this issue. However, our preference is for 0450B as we feel the proposed minimum of 200 monthly SSP AQ appeals for Users supplying more than 50 SSP meter points (with the excess once this allocation has been made to all eligible Users to be distributed on the basis of market share) is more suitable than the 50 monthly SSP AQ appeals proposed under 0450 and 0450A as the greater amount will result in a greater benefit to competition.

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?

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We believe that implementation would further relevant objectives d) i) and ii) securing of effective competition between relevant shippers and suppliers.

Impacts and Costs:

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

Aside from Co-Operative Energy's share of the User Pays charges in relation to implementation and ongoing costs, we believe that we would face relatively small internal costs around systems and process changes.

Implementation:

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

We support the implementation dates proposed in the draft modification report, i.e. 01 September 2014 should a decision to implement be received by 31 January 2014, or 01 October 2014 should a decision to implement be received by 28 February 2014.

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.