

Representation

Draft Modification Report

0428/0428A - Single Meter Supply Points

Consultation close out date: 10 June 2013

Respond to: enquiries@gasgovernance.co.uk

Organisation: DONG Energy Sales (UK) Limited
("DONG Energy")

Representative: Lorna Lewin

Date of Representation: 10 June 2013

Do you support or oppose implementation?

0428 - Not in Support

0428A - Support

If either 0428 or 0428A were to be implemented, which would be your preference?

Prefer 0428A

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

0428 unfairly penalises customers who entered into site works arrangements with network operators based on rules and policies at the time, which allowed for aggregated configurations.

0428 will force these customers out of their existing arrangements and will bring increased costs either through increased transportation charges or re-engineering solutions.

0428A will retain the exiting aggregated configurations and will allow no new aggregations to be created from an implementation date. This honours the existing agreements without unfairly penalising affected customers. This will ensure that customers can make the appropriate engineering decisions in the future based on the new rules.

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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0428A meets relevant objective d) by allowing existing aggregated configurations to remain which ensures that there remains effective completion between relevant shippers/suppliers.

Impacts and Costs:

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

Implementation of 0428 would see significant transportation or re-engineering costs to affected customers. In addition this modification will generate renegotiation of contracts for affected customer and will require additional resource to de-aggregate all aggregated configurations.

0428 would have no impact.

Implementation:

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

We do not support 0428 and therefore do not suggest any implementation lead-time.

0428A - we would support an implementation of 1st April 2014 to allow time for customers to be advised of the new changes.

Legal Text:

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

Legal text has not been reviewed

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