

Representation

Draft Modification Report

0395: Limitation on Retrospective Invoicing and Invoice Correction

Consultation close out date: 03 February 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: E.ON UK
Representative: Brian Durber
Date of Representation: 03 February 2012

Do you support or oppose implementation?

Not in Support

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

In general we are in support of shorter timescales as they reduce financial risk and promote timely resolution of queries. We made these points in our response to UNC 0398. However we share the concern of others that moving to a 2 to 3 year model may result in significant amounts of energy associated with Significant Offtake Meter Errors being socialised rather than targeted. Therefore whilst we believe that UNC 0398 is a positive step our view is that UNC 0395 may be a step too far at this stage.

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

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Impacts and Costs:

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

Implementation:

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

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Version 1.0

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Legal Text:

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

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.