

Representation

Draft Modification Report

0398: Limitation on Retrospective Invoicing and Invoice Correction (3 to 4 year solution)

Consultation close out date: 09 January 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: **E.ON UK**
Representative: Brian Durber
Date of Representation: 09 January 2012

Do you support or oppose implementation?

Support

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

This Proposal will reduce the financial risk to Shippers as it reduces their exposure to large and unexpected bills. It will also incentivise the prompt resolution of queries and associated reconciliations. Based on information provided by Xoserve a reduction to a 3-4 year billing backstop would not significantly increase the amount of corresponding unreconciled energy and therefore we see no disadvantages to this Proposal.

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? Modification Panel Members have indicated that it would be particularly helpful if respondents could indicate their preferred implementation timescale.

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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.