

Representation

Draft Modification Report

0428/0428A - Single Meter Supply Points

Consultation close out date: 10 June 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: EDF Energy
Representative: Naomi Anderson
Date of Representation: 07 June 2013

Do you support or oppose implementation?

0428 - Support

0428A - Support

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

Prefer 0428

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

Modification Proposal 428

EDF Energy supports adding simplicity to the current transportation regime. We feel that aggregated metering arrangements add unnecessary complexity to gas processes which inflate the cost of managing shipper systems. We feel business sites with aggregated regimes will be able to access supply contracts from fewer suppliers than sites with simpler configurations.

EDF Energy believes that wherever possible gas transportation charges should be cost reflective. We feel Modification Proposal 428 promotes cost reflectivity and competition.

Modification Proposal 428A

We feel that the principle benefits of promoting cost reflectivity through transportation charges cannot be fully realised by implementing Modification Proposal 428A. Whilst Improving cost reflectivity going forward would be of some benefit, the materiality would not be significant for some time.

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

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Version 1.0

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Relevant Objectives:

- c) Efficient discharge of the licensee's obligations.
- d) Securing of effective competition between shippers

EDF Energy does not feel that the current regime is cost reflective and as such the Modification Proposal 0428 better facilitates the effective running of the network and reduces any cross subsidy between Shippers.

Impacts and Costs:

There would be some minor IT and process changes which would have minimal cost associated to them.

Implementation:

Given the systems and process impact to EDF Energy we propose a 6 month implementation time scale.

Legal Text:

We have no comments the legal text.

Is there anything further you wish to be taken into account?

None