

Representation

Draft Modification Report

0382 - Reducing the capacity element of LDZ system charges for SSPs

Consultation close out date: 12 September 2011

Respond to: enquiries@gasgovernance.co.uk

Organisation: Opus Energy Ltd

Representative: Philip Hayward

Date of Representation: 09 September 2011

Do you support or oppose implementation?

Support/Qualified Support/Neutral/Not in Support/Comments* *delete as appropriate*

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

The current method of charging 95% of LDZ charges based on capacity causes a disparity between revenue and LDZ charges in summer months. This can be problematic for new entrants to the market. The current system therefore constitutes a barrier to entry for new participants. This change would better facilitate effective competition among suppliers by lowering this barrier.

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?

It would better meet objective c) by facilitating effective competition between suppliers. As per reasons above.

Impacts and Costs:

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

None

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Implementation:

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

ASAP

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