

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: **RWE Npower**
Representative: Andy Jones
Date of Representation: 09 January 2012

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.

Npower do not support Modification 0398 as we believe there is an obligation to provide corrective customer billing if necessary (in line with The Statute of Limitations Act 1980). We see this Modification as a means of reducing the timescales available to produce retrospective bills.

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

None

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Npower do not believe that Mod 0398 satisfies relevant objective (d) as there remains a risk of billing anomalies with some of our larger customers.

Impacts and Costs:

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

Having successfully reconciled historic volumes during 2011, npower believe there will continue to be opportunities in the future.

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.

The proposed implementation date in 2012 will significantly affect our ability to accurately reconcile historical volumes.

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