

## Representation

### Draft Modification Report

#### **0447S: Exception to Code Cut Off Date for energy Balancing debt Recovery purposes.**

**Consultation close out date:** 15 April 2013  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** RWE npower  
**Representative:** Amie Charalambous  
**Date of Representation:** 15 April 2013

#### **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.**

RWE appreciate the intention of this modification and believe that in exceptional circumstances, it will facilitate improvements to correctly allocate recovered debt.

We understand that it may take longer than the existing code cut off date allows, to recover these debts and to re-allocate them accordingly and for this reason, we would welcome steps taken to allow the correct allocation of debt recovery, thus reducing the risk of the gas community to socialised bad debt.

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

No

#### **Self Governance Statement:**

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

Yes

#### **Relevant Objectives:**

*How would implementation of this modification impact the relevant objectives?*

RWE npower feel that for the circumstances indicated above this would facilitate objective D – Securing of effective competition.

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Version 1.0

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**Impacts and Costs:**

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

Providing there are no changes to the invoicing formats there would be minimal impacts

**Implementation:**

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

We would expect to see the standard lead time for the implementation of this modification

**Legal Text:**

*Are you satisfied that the legal text [and the proposed ACS (see [www.gasgovernance.co.uk/proposedACS](http://www.gasgovernance.co.uk/proposedACS))] will deliver the intent of the modification?*

No

**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