

Representation

Draft Modification Report

0369/0369A: Alternative Re-establishment of Supply Meter Points – measures to address shipperless sites

Consultation close out date: 03 February 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: **RWE npower**

Representative: Edward Hunter

Date of Representation: 03 February 2012

Do you support or oppose implementation?

0369 - Not in Support

0369A - Not in Support

If either 0369 or 0369A were to be implemented, which would be your preference?

Prefer **0369A**

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

Presently, RWE npower does not believe that the benefits of this solution would merit its development costs. We note that the costs of implementing this change are still unclear, and much will depend on the detailed processes which are yet to be fully developed. The modifications also present a significant risk to data quality within internal systems and to our ability to invoice back-dated transportation charges due to the ERA code on back-billing.

In addition, these modifications may also lead to increased costs to the consumer arising from the need to remove and replace meters where necessary.

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

No

Relevant Objectives:

How would implementation of either of these modifications impact the relevant objectives?

d) Securing of effective competition:

(i) between relevant shippers;

(ii) between relevant suppliers; and/or

(iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.

Impacts and Costs:

What analysis, development and ongoing costs would you face if either of these modifications were implemented?

This modification would require development of npower systems. Given that the detailed solution and cost allocation method are not clear, it is hard to quantify the cost impact.

Implementation:

What lead-time would you wish to see prior to either of these modifications being implemented, and why?

N/A

Legal Text:

Are you satisfied that the legal text will deliver the intent of each 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