

Representation

Draft Modification Report

0395: Limitation on Retrospective Invoicing and Invoice Correction

Consultation close out date: 03 February 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: RWE npower
Representative: Andy Jones
Date of Representation: 03 February 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 are not in support of Modification 0395.

There is an obligation to provide corrective customer billing (in line with The Statute of Limitations Act 1980) and this Modification will reduce the timescales available to produce retrospective bills. In addition, Modification 0398 has been recommended to be implemented and, if approved by Ofgem, we would like the opportunity to evaluate the benefits of this Modification before moving towards the shorter reconciliation time period that Modification 0395 would deliver.

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?

n/a

Impacts and Costs:

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

n/k

Implementation:

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

n/a

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

n/a

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