

Representation

Draft Modification Report

0428/0428A - Single Meter Supply Points

Consultation close out date: 10 June 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: SSE
Representative: Mark Jones
Date of Representation: 10 June 2013

Do you support or oppose implementation?

0428 - Support

0428A - Not in Support

If either 0428 or 0428A were to be implemented, which would be your preference?

Prefer 0428

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

The current arrangements are not cost reflective and with the potential introduction of Project Nexus, now is an ideal time to amend the rules because as well as making charging fairer, it will lead to less system development due to the complexity of the current rules around multi site supply points, as well as lowering ongoing costs to administer the arrangements. The current arrangements include situations where aggregated sites have nothing in common, yet benefit from lower transportation charges compared to other very similar sites by virtue of the fact that they happen to be located in a fortunate location. This benefit is unfairly subsidised by other customers.

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?

We agree with the proposer that implementation would positively impact relevant objectives C and D by providing cost reflective charging under a much simpler regime which would promote competition between shippers.

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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?

SSE would face a small amount of analysis and potential development costs.

Implementation:

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

We agree with the proposer that it should be implemented on 1st April 2014.

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.