

## 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:** **Scotland & Southern Gas Networks (SGN)**

**Representative:** David Mitchell

**Date of Representation:** 04 January 2012

#### **Do you support or oppose implementation?**

Support

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

The evidence provided by Xoserve shows no benefit of having a reconciliation period of greater than 3 years and 364 days. The proposed reconciliation period should help to ensure that energy reconciliation is carried out in a timely manner. We believe that this modification allows UNC Modification 152 to be updated with little impact to the industry.

#### **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 agreed that the proposal will better facilitate Relevant Objective (d) in that by reducing shippers exposure to retrospective billing will reduce the risk of them being exposed to large and unexpected bills, this in turn will be beneficial to competition amongst shippers.

#### **Impacts and Costs:**

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

None

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Version 1.0

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**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.*

April 2012

**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