

Representation

Draft Modification Report

0403: EU Third Package: 21 day switching with flexible objection period

Consultation close out date: 02 March 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: ScottishPower Energy Management Ltd

Representative: Lorna Gibb

Date of Representation: 01 March 2012

Do you support or oppose implementation?

Not in Support

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

We appreciate what this change is trying to achieve by allowing as long as possible to raise objections throughout the vast majority of the year. However, we feel the costs to change Xoserve's processes and supplier systems far outweigh any benefits.

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

See comments to 0396

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Impacts and Costs:

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

We do not have detailed costs but high level assessment suggests costs of a minimum of £500k (UNC & iUNC).

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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?

While we appreciate this change is a licence requirement, due to the complexities it would introduce to the objection process we would request a minimum of 9months lead in from Authority approval.

Legal Text:

Are you satisfied that the legal text and the proposed ACS (see www.gasgovernance.co.uk/proposedACS) 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.