

## Representation

### Draft Modification Report

#### 0425: Re-establishment of Supply Meter Points – Shipperless sites

**Consultation close out date:** 15 April 2013  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** ScottishPower  
**Representative:** Marie Clark  
**Date of Representation:** 12 April 2013

#### Do you support or oppose implementation?

Not in Support *delete as appropriate*

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

We understand the need to take appropriate action where it is found that gas is capable of/or being consumed at a consumer's premise which has been subject to a previous isolation and withdrawal from a Shipper portfolio. However, in instances where a meter is found at the consumer's premise which is different from that previously installed whilst under the registration of the previous Shipper, we do not support that this Shipper should be responsible for resolving the issue by undertaking investigations to ascertain the circumstances under which gas has been offtaken.

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

Insert Text Here

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

While we support initiatives to assist in the reduction of instances of Shipperless sites via the implementation of Mod 424, in instances where the previous Registered Shipper has taken all appropriate steps to isolate and withdraw from the site and instigated a meter removal, they cannot be held responsible should a third party acting on behalf of the consumer or otherwise connect a meter which is capable of offtaking gas.

We believe that the Gas Transporter should take all appropriate steps to ascertain the current situation at the site. If necessary they should investigate any illegal extraction of gas and ensure through appropriate communication and follow-up action, that the consumer is actively encourage to contract with a suitable Supplier.

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Our commercial and contractual relationship with the customer ceased when we stopped being the Registered Shipper at the site. We therefore do not believe that we have any contractual power of entry at the site to undertake the required investigation.

We do not believe that this Modification furthers any of the UNC Relevant Objectives.

### **Impacts and Costs:**

**If this Modification is approved, ScottishPower will face additional risk and costs associated with investigation these sites.**

Insert Text Here

### **Implementation:**

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

Insert Text Here

### **Legal Text:**

*Are you satisfied that the legal text [and the proposed ACS (see [www.gasgovernance.co.uk/proposedACS](http://www.gasgovernance.co.uk/proposedACS))] will deliver the intent of the modification?*

Insert Text Here

### **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.*

Insert Text Here