

Representation

Draft Modification Report

0282 / 0282A: Introduction of a process to manage Vacant sites

Consultation close out date: 03 June 2011

Respond to: enquiries@gasgovernance.co.uk

Organisation: **Spark Gas Shipping Limited**

Representative: Helen Hill

Date of Representation: 17 May 2011

Do you support or oppose implementation?

0282 - ~~Support/Qualified Support/Neutral/Not in Support/Comments*~~ *delete as appropriate*

0282A - ~~Support/Qualified Support/Neutral/Not in Support/Comments*~~ *delete as appropriate*

If either 0282 or 0282A were to be implemented, which would be your preference?

Prefer ~~0282/00282A~~ *delete as appropriate*

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

Spark Gas Shipping supports the two proposals although our preference is for 0282A. As a small supplier focussed on the rental market we have a high proportion of vacant properties in our portfolio. Removing the obligation to pay commodity charges on these vacant properties would have a significant impact on our business.

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

Spark Gas Shipping is in a fairly unique situation when it comes to vacant properties as we do have access to meter reads. We would like to propose, therefore, that an additional method for notifying vacant premises could be to provide 2 meter readings showing a zero or minimal advance.

We would also like to propose that the minimum time period for provision of the two unobtained reads or zero/minimal reads should be shortened to 30 days. This would lessen the exposure to commodity charges on vacant properties, greatly assisting cash flow which is a major issue for smaller suppliers.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

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Impacts and Costs:

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

Minimal.

Implementation:

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

As soon as possible as this would greatly assist cash flow.

Demand Information:

Please provide demand information to enable finalisation of the ACS.

4,500 MPRNs

Legal and ACS (Agency Charging Statement) Text:

Are you satisfied that the legal and ACS 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.

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