

Representation

Draft Modification Report

0428/0428A - Single Meter Supply Points

Consultation close out date: 10 June 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: Total Gas & Power Ltd
Representative: Andrew Green
Date of Representation: 10th June 2013

Do you support or oppose implementation?

0428 - Not in Support

0428A - Support

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

Prefer 0428A

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

TGP supports the phased introduction of Single Meter Supply Points proposed under 0428A as this would not change existing arrangements or charges that customers currently pay at aggregated supply points. It would be unfair for these customers to experience increased transportation charges as a result of the disaggregation, having entered into connections and charging arrangements based on commercial arrangements prevailing at the time. TGP would support the grandfathering of existing arrangements under 0428A to protect these Industrial and Commercial consumers from such price shocks to their energy costs. The gradual migration over to single meter supply point arrangements is therefore fairer and preferable.

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?

Effective competition would be maintained for existing aggregated supply points and on new single meter supply points moving forward.

Impacts and Costs:

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

Implementation:

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

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

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.