

## Representation

### Draft Modification Report

#### **0369/0369A: Alternative Re-establishment of Supply Meter Points – measures to address shipperless sites**

**Consultation close out date:** 03 February 2012

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** Wales & West Utilities Ltd

**Representative:** Simon Trivella

**Date of Representation:** 03 February 2012

## Do you support or oppose implementation?

**0369 – Support**

**0369A – Support**

## If either 0369 or 0369A were to be implemented, which would be your preference?

Prefer **0369**

## Please summarise the key reason(s) for your support.

Modification proposal 0369 was raised following lengthy industry discussions regarding Shipperless sites, unregistered sites and theft of gas. This proposal seeks to address the situation where a Shipper has notified that a meter is no longer capable of flowing gas, and/or has been removed, but is subsequently found to be incorrect (i.e. the meter is found in-situ and capable of flowing gas). Implementation of this proposal (0369) would provide the Transporters with the ability to ensure that the Shipper, responsible at the time of the isolation/withdrawal, can be allocated charges for the period where gas was thought to be not in supply.

If this proposal (0369) were not to be implemented then these charges will continue to be picked up by all SSP Shippers through RbD and UoS charges (and potentially by LSP Shippers through any related allocation by the 'allocation of unidentified gas expert' (AUGE)). The proposal also allows for Transporters to recover the cost of any unnecessary work (including site visits) that has been incurred in these scenarios as they are not funded for through Price Control Review allowances.

Proposal 0369A seeks to exclude customer owned meters from the arrangements detailed within the original proposal 0369. Whilst we appreciate that the Shipper/Supplier may not be able to physically remove a customer owned meter from the customer's property, the proposed arrangements should apply as they put in place the mechanism for the industry to recover the appropriate costs. The Shipper will initially be charged for such costs but then have the ability to reclaim these from the customer. The number of customer owned meters is very small and we do not believe that these scenarios will occur on a frequent basis (if ever). We therefore still support the modification proposal (0369A) as the majority of the benefits from 0369 will still apply, however, our preference is for the original 0369 proposal.

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

We have not identified any new or additional issues to record in the modification report.

**Relevant Objectives:**

*How would implementation of either of these modifications impact the relevant objectives?*

We agree with the Proposers that implementation of either modification proposal will facilitate both relevant objectives A11.1(d) and A11.1(f) of the transporter licence.

**Implementation:**

*What lead-time would you wish to see prior to either of these modifications being implemented, and why?*

We agree with the proposer that either proposal could be implemented almost immediately following a decision to implement from the Authority.

**Legal Text:**

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

We are satisfied that the legal text will deliver the intent of each 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.*

We have nothing further that we wish to be taken into account.

Hopefully these comments are helpful to the Modification Panel and to the Authority; please do not hesitate to contact me should you have any questions relating to this matter.

Yours sincerely

*{By email}*

Simon Trivella  
Regulation & Commercial Manager  
Wales & West Utilities Ltd  
Tel: 07813 833174  
E-Mail: [simon.trivella@wwutilities.co.uk](mailto:simon.trivella@wwutilities.co.uk)