

Representation

Draft Modification Report

0398 - Limitation on Retrospective Invoicing and Invoice Correction (3 to 4 year solution)

Consultation close out date: 09 January 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: Wales & West Utilities Ltd
Representative: Simon Trivella
Date of Representation: 29 December 2011

Do you support or oppose implementation?

Support

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

Based on the information and analysis provided by Xoserve we believe that a reduction to a 3-4 year billing backstop would not significantly (or materially) increase the amount of corresponding unreconciled energy. Whilst we appreciate the concerns raised by parties that this could increase the risk to smaller parties we believe that this model presents an appropriate balance of risk and incentive that should help to ensure that energy reconciliation is carried out in a timely manner.

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

We have not identified any new issues.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

As the proposer, we agree with the reasoning we provided in the original modification proposal that implementation may further the achievement of relevant objectives (d) and (f).

Impacts and Costs:

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

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Version 1.0

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Implementation would not lead to any development or ongoing costs for WWU. There would be minimal changes required to central systems / reporting and this would not lead to any material incremental costs, we therefore agree with the proposer that this is not a User Pays proposal.

Legal Text:

Are you satisfied that the legal 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.

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}

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