

## Representation

### Draft Modification Report

#### 0428/0428A - Single Meter Supply Points

**Consultation close out date:** 10 June 2013  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** Wales & West Utilities  
**Representative:** Robert Cameron-Higgs  
**Date of Representation:** 07 June 2013

#### Do you support or oppose implementation?

0428 - Support

0428A - Qualified Support

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

Prefer 0428

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

Cross subsidies should not exist and if they exist as a historic legacy of gas Transportation arrangements, they should be removed with sufficient notice for all affected parties. Proposal 0428 seeks to provide cost reflective charging and to remove a number of cumbersome and complex processes that are required to administer these sites.

WWU's current aggregated supply point analysis (below) demonstrates that in the >732,000 market in excess of 75% of meter points are not being charged the 'correct rate'.

Summary of table below: Column (2) is the number of supply points, by load band, which contain more than one meter point. Column (3) shows how the meter points would be spread over the various load bands if they were not aggregated into a supply point. There is no direct relationship between columns 2 and 3. Some of the meter points relate to supply points that are shown against higher load bands

<u>kWh (1)</u>	<u>Aggregated(2)</u>	<u>Disaggregated(3)</u>
LSP >732,000	3365	767
LSP <732,000	5073	3725
SSP	1239	5185

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Version 1.0

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**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?*

Relevant objectives (c) and (d) are satisfied since Transportation charges would be improved/correctly targeted, therefore benefiting competition.

**Impacts and Costs:**

*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?*

Consistent with the comments within the proposal(s)

**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.*

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