

Representation

Draft Modification Report

0451V 0451AV: Individual Settlements For Pre-Payment & Smart Meters

Consultation close out date: 08 January 2014

Respond to: enquiries@gasgovernance.co.uk

Organisation: Winchester Gas

Representative: Huw Comerford

Date of Representation: 06 January 2014

Background to this consultation

The consultation is aimed at establishing if the content/effect of the variations have caused you to change a view that you previously expressed, or to take a view that you had not previously considered.

Do you support or oppose implementation?

0451V - Support

0451AV - Not in Support

If either 0451V or 0451AV were to be implemented, which would be your preference?

Prefer **0451V**

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

We have submitted evidence, in the form a daily meter reads, that shows that the profile of the pre-payment customer is flatter than that of a standard domestic customer which effectively results in over allocation in the winter and under allocation in the summer period. With the variances between gas prices in the summer and winter period this can have a significant impact on a shipper especially a shipper focusing on this sector of the market. This impact can increase significantly in colder winters to a degree we saw an over allocation of over 10% for the previous winter. This creates an unsustainable position for any shipper, but especially a small shipper. We have chosen to support the original version of this modification as we strongly believe that there is a case for retrospection as the current method of allocation meant that we saw, due to the colder winter last year, a larger over allocation that we had historically seen and could not have reasonably predicted.

0451V 0451AV
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06 January 2014

Version 1.0

Page 1 of 2

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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 these modifications impact the relevant objectives?

Any increase of the accuracy of cost allocation can only help effective competition as it will enable shippers to set more accurate and cost reflective tariffs.

Impacts and Costs:

What analysis, development and ongoing costs would you face if either of these modifications were implemented?

Implementation:

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

We would like to see this modification implemented as soon as possible

Legal Text:

Are you satisfied that the legal text and the proposed ACS (see www.gasgovernance.co.uk/proposedACS) will deliver the intent of the modifications?

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.

No