

## 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:** ScottishPower Energy Management Ltd

**Representative:** Marie Clark

**Date of Representation:** 7 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** - Not in Support

**0451AV** - Not in Support

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

Prefer **0451AV**

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

ScottishPower confirm that we have not changed our view that we do support either Modification. We believe that the Proposer has failed to provide sufficient evidence to demonstrate that an additional profile is required for PPMs.

Adopting a EUC Profile which is not based on daily reads recovered from a robust test environment and acquired from all LDZs introduces risk to the market and in particular Shippers who operate within the SSP market sector.

It is inconceivable that one group of customers is singled out at the expense of another class of domestic customers who may also have a different consumption profile from the standard profile which is currently applied. Implementing this modification will result in a cross-subsidy being introduced between customers within the SSP market sector. This will introduce additional uncertainty to SSP

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shippers and further reduces the integrity of the gas settlements process.

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

None identified

**Relevant Objectives:**

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

We believe that implementation of these Modifications will be detrimental to competition between Shipper and Suppliers.

**Impacts and Costs:**

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

Systems changes would be required in order to implement the solution. Should Mod 451V be implemented, which includes a retrospective element, this will introduce additional uncertainty for SSP Shippers and further reduce the integrity of the gas settlements process. As a consequence, some SSP Shippers and their customers will be adversely impacted to the benefit of others.

**Implementation:**

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

**Legal Text:**

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

None identified

**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.*

None identified.