

Representation

Draft Modification Report

0424: Re-establishment of Supply Meter Points – prospective measures to address shipperless sites

Consultation close out date: 02 November 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: RWE npower
Representative: Richard Vernon
Date of Representation: 01 November 2012

Do you support or oppose implementation?

Support

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

Shipperless sites are a significant concern for the Industry. Addressing this issue, a root cause of 'new' Shipperless sites is a step forward. Where Shippers isolate and withdraw from a site without correctly removing the ability to consume gas (through registered metering equipment) this adversely impacts other Parties. This adds to the cost of unallocated gas borne by the industry.

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

There may be scenarios beyond the influence of the Shipper. Specifically where Customer owned meters are installed. These meters may need to remain on site following isolation (as they are not an industry asset). There is a risk that this meter could be reconnected at site without knowledge or consent of the previously registered Shipper.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We agree with the proposer. This modification will positively impact both effective competition through correct allocation of costs (d) and promote efficiency in the implementation of the UNC (f).

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Impacts and Costs:

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

Some process changes may be needed to account for any queries which may be received as a result of this modification.

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

6-12 months to embed any required process changes.

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 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.

No