

## Representation

### Draft Modification Report

#### Modification 0424: Re-establishment of Supply Meter

#### Points – prospective measures to address shipperless sites

**Consultation close out date:** 2<sup>nd</sup> November 2012

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** Gazprom Marketing & Trading Retail (GMT&R) trading as Gazprom Energy

**Representative:** Steve Mulinganie  
Regulation & Compliance Manager

**Date of Representation:** 2<sup>nd</sup> November 2012

**Do you support or oppose implementation?**

**We DO NOT SUPPORT implementation**

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

**We believe the proposal places an unreasonable obligation on the incumbent Supplier when the Supplier has undertaken the appropriate recognised work to enable them to Withdraw from the site. Having used Accredited Meter Assets Managers to undertake the appropriate physical works that meet the requirements for enabling an Isolation and Withdrawal the Supplier should not be subject to retrospective penalties if that meter is subsequently reconnected.**

**In this unbundled competitive market it is the Accredited Meter Asset Managers (MAMs) responsibility to carry out the works and ensure the Metering Equipment is appropriately managed.**

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

**There are NO new issues we wish to add**

**Relevant Objectives:**

*How would implementation of this modification impact the relevant objectives?*

**As this modification places significant risk on the Shipper, over which it has no effective control, then it will result in unwarranted costs being placed on Shippers reducing the accuracy of cost targeting and so be detrimental to relevant objective (d). This modification also fails relevant objective (f) -the promotion of efficiency in the implementation and administration of the network code and or/uniform network code as it places obligations into the UNC which should be in the MAMCoP.**

**Impacts and Costs:**

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

**Suppliers may be required to undertake additional works to mitigate the risk of retrospective charges. This would involve extending the scope of the works from Meter Removal to Meter Removal and Service Cut Off. This will increase costs to customers and also lead to delays when seeking to reconnect the site at a later date i.e. new services will have to be laid**

**Implementation:**

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

**If this modification were to be implemented, then a significant lead time would be required to allow suppliers to align their processes and incorporate suitable risk premiums into their prices.**

**Legal Text:**

*Are you satisfied that the suggested legal text will deliver the intent of the modification?*

**We have not identified any issues with the proposed text.**

**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**