

## 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:** Scotland & Southern Gas Networks  
**Representative:** Erika Melén  
**Date of Representation:** 30 October 2012

#### **Do you support or oppose implementation?**

We Support the implementation of MOD0424

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

Shipperless sites pose a great risk to the industry as a whole both in terms of incorrectly allocated costs which can not be recouped by a supplier from the consumer in question and also in terms of safety.

This modification is looking to address scenarios where the Supplier has isolated and withdrawn from the supply point and the meter has been removed from the system. After 12 months the relevant DNO will carry out the service disconnection GS(I&U)R visit but find the original meter still on site and capable of flowing gas. In this scenario this modification is looking to enable the transporter to register the supply point to the previous supplier/cancelling the withdrawal and so enabling the accurate allocation of transportation and energy charges. The modification will also enable the Transporters to recover costs for the visits carried out as, had the appropriate action been taken by the supplier, these visits would not have been required.

As this modification ensures the correct allocation of costs to the responsible party (as already set out in the UNC) through registration of the relevant sites we fully support implementation.

#### **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?*

We agree with the proposers that this modification will both better facilitate effective competition (d) between shippers/suppliers through the effective targeting and allocation of costs. It will also ensure supply points are registered to the relevant User thereby enabling the efficient operation of the UNC (f)

**Impacts and Costs:**

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

None

**Implementation:**

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

None

**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 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.*

Although we do understand the reasons behind this modification applying to prospective isolated/withdrawn sites only we would be supportive of the principles of registration to the previous User being applied to the current backlog of shipperless sites where the same meter has been found. We do appreciate that a further UNC modification will be required and this issue should not hinder the implementation of this Modification 0424.