

# 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:** WWU

**Representative:** Robert Cameron-Higgs

**Date of Representation:** 02 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 an acknowledged area of concern and risk to the industry with regards to incorrectly allocated costs which cannot be readily from a consumer by the relevant supplier. UNC proposal 0424 seeks to remedy aspects of this problem through dealing with situations where a supplier has isolated and withdrawn from a supply point and the meter removed from the system. After a year the DNO when carrying out a GSR service disconnection discovers the original meter in situ and capable of flowing gas.

As a result of such findings, this proposal allows the Transporter to register the supply point to the previous supplier, in effect cancelling the withdrawal and charging the relevant transportation and energy charges. Site Visit charges would also be recoverable by the Transporter in such instances.

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

No

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### **Relevant Objectives:**

How would implementation of this modification impact the relevant objectives?

(d) between shippers/suppliers by more accurate allocation of transportation charges

## **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?

## **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.

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