

Representation For. 0089

"Clarification of Timescales to Revise AQ for Small Supply Point threshold-crossers"
Version 1.0

Date of Communication: 29/08/2006
External Contact: Marie Clark(Scottish Power)
Slant: Against
Strictly Confidential: No

Abstract

Tim

ScottishPower do not support the implementation of this Modification Proposal.

Under current UNC rules, Shippers have until the commencement by xoserve of the Provisional Annual Quantity calculations to submit AQ appeals to increase Smaller Supply Point offtakes values so that they becomes Larger Supply Points in order to avoid Mod 640 reconciliation charges. We believe the current appeal window provides more than adequate time for Shippers to submit AQ appeals. Should this Modification Proposal be implemented to allow appeals until the end of the Provisional Annual Quantity calculation, this will increase the volume of misallocated energy that flows through RbD settlement.

ScottishPower are of the view that Shippers need to proactively manage their Supply Point portfolio and therefore should be incentivised to appeal erroneous AQ values as early in the process as possible.

Kind regards

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