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Your Reference 0099

**Modification Proposal 0099: 'Management of erroneous Domestic AQs during the Registration process'**

Dear Julian,

Thank you for your invitation seeking representations with respect to the above Modification Proposal.

National Grid (Distribution) (UKD) has the following comments to make with respect to certain sections of the Final Modification Report that will be submitted to the Authority for its consideration.

**Modification Proposal**

UKD would like to offer support for implementation of this Proposal which seeks to introduce a table of Annual Quantity (AQ) values (based on house type) within a proforma. This proforma would be used during the change of supplier process and where no Meter Readings are available to correct an erroneous AQ value. This particular document would only be used for residential properties with an AQ above 293,000 kWhs. The provision of actual Meter Readings would always be the preferred basis for appeal. However, UKD understands that this necessitates delay and that the signed declaration required on the existing BTU form may be difficult to obtain within the timetable set out in the UNC.

UKD therefore agrees that the proposed AQ table, currently utilised within the CSEP NExA, should prove to be a useful tool.

**Relevant objectives**

UKD believes that implementation of this Modification Proposal would further the relevant objective set out in SSC A11 1 (d) (ii) of the GT Licence by securing effective competition between relevant suppliers. It should improve cost reflectivity and make the change of supplier process more efficient.

**Implications for Transporters and each Transporter of implementing the Modification Proposal:**

**development and capital cost and operating cost implications:**

UKD recognises that this is a manual process and the numbers likely to be received are as yet unknown and there will be a requirement for ongoing monitoring by xoserve. Consequently the effort required is as yet unquantified.

**extent to which it is appropriate to recover the costs, and proposal for the most appropriate way to recover the costs:**

Should additional costs be incurred it is proposed that these would be recovered by the current cost recovery mechanism.

**The consequence of implementing the Modification Proposal on the level of contractual risk of each Transporter under the Code as modified by the Modification Proposal**

No additional contractual risk is anticipated.

**The high level indication of the areas of the UK Link System likely to be affected, together with the development implications and other implications for the UK Link Systems and related computer systems of each Transporter and Users**

No system development requirements are anticipated.

**The implications of implementing the Modification Proposal for Users, including administrative and operational costs and level of contractual risk**

UKD does not believe that there would be any significant cost implications or contractual risk implications as a consequence of implementation of this Proposal.

**The implications of implementing the Modification Proposal for Terminal Operators, Consumers, Connected System Operators, Suppliers, producers and, any Non Code Party**

UKD agrees with the Proposer that more accurate cost allocation should result in more appropriate charges for consumers and that a more efficient change of supplier process should improve the consumer experience.

**Analysis of any advantages or disadvantages of implementation of the Modification Proposal**

**Advantages**

- Improvement to the change of supplier process for some customers.
- More appropriate charges for some customers.

**Disadvantages**

- In some instances the information provided by the use of the proforma will not be as accurate as that which would have been supplied using the BTU form.

**Proposed implementation timetable (including timetable for any necessary information systems changes)**

UKD believes that implementation could be effective shortly after direction from the Authority.

**Text**

UKD believes that the text provided with the Draft Modification Report correctly reflects the Proposal. UKD would highlight that should the current table contained within the CSEP NExA be changed, to reflect such a change within the UNC table it would be necessary to raise a further UNC modification proposal.

Yours sincerely

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