

## Representation

### Draft Modification Report

#### 0282 / 0282A: Introduction of a process to manage Vacant sites

**Consultation close out date:** 03 June 2011

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

**Organisation:** First Utility

**Representative:** Chris Hill

**Date of Representation:** 01 June 2011

#### Do you support or oppose implementation?

0282 - Qualified Support

0282A - Support

#### If either 0282 or 0282A were to be implemented, which would be your preference?

Prefer 0282A

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

Although First Utility regards both modifications as an improvement over the current regime dealing with vacant sites as they give SSP suppliers more options than at present, we do not feel that it is appropriate for sites deemed to be vacant to be excluded from RbD as this may result in a distortion of RbD costs. In addition, it may detract from ongoing attempts to assess the actual size of RbD.

#### 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?*

Implementation of either of these modifications would facilitate the relevant objective of securing effective competition between suppliers due to the fact that the processes proposed would be more cost effective way of dealing with vacant sites than the current process of isolation.

**Impacts and Costs:**

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

Eligible suppliers would benefit from a reduction in costs as commodity charges would no longer have to be paid for eligible vacant sites.

**Implementation:**

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

We believe that either Modification could be implemented shortly after a decision was received from Ofgem.

**Demand Information:**

*Please provide demand information to enable finalisation of the ACS.*

<100 eligible NDM SSPs.

**Legal and ACS (Agency Charging Statement) Text:**

*Are you satisfied that the legal and ACS text 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.*

No.