

Representation

Draft Modification Report

0335: Offtake Metering Error – Payment Timescales

and

0335A: Significant Offtake Metering Error – Small Shipper Payment Timescales

Consultation close out date: 02 December 2011

Respond to: enquiries@gasgovernance.co.uk

Organisation: The Renewable Energy Company Ltd (Ecotricity)

Representative: Emma Cook

Date of Representation: 14th November 2011

Do you support or oppose implementation?

0335 - Support/Qualified Support/Neutral/Not in Support/Comments* *delete as appropriate*

0335A - Support/Qualified Support/Neutral/Not in Support/Comments* *delete as appropriate*

Ecotricity believe 0335 and 0355A both represent an improvement in the current process. Both proposals will make it easier for us to account for unexpected costs.

If either 0335 or 0335A were to be implemented, which would be your preference?

Prefer 0335/~~0335A~~ *delete as appropriate*

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

Ecotricity feel 0335 provides a greater incentive to Gas Transporters to improve metering. Whereas proposal 0335A would continue to protect Gas Transporters from the greater part of their errors. However, given our size at present, both proposals would help our cash-flow.

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

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Ecotricity do not know of any additional issues which should be recorded in the Modification Report.

Relevant Objectives:

How would implementation of these modifications impact the relevant objectives?

The implementation of these modifications will have a positive impact on the relevant objectives.

Impacts and Costs:

What analysis, development and ongoing costs would you face if these modifications were implemented?

We will not be directly impacted by either of these modifications if the decision to implement is given under the current timeframe. However, if timescales are prolonged it may have an impact on our business.

Implementation:

What lead-time would you wish to see prior to these modifications being implemented, and why?

We would like to know as soon as possible at which point these modifications will be implemented to ensure we have the correct processes in place.

Legal Text:

Are you satisfied that the legal text will deliver the intent of each modification?

Ecotricity are satisfied that the legal text will deliver the intent of each modification.

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.

Ecotricity have nothing further to add in response to this draft modification report.