

Representation

Draft Modification Report

0362 - Use of 'notional Meter Readings' and 'Agreed Opening Meter Readings' for Individual CSEP Reconciliation

Consultation close out date: 19 May 2011
Respond to: enquiries@gasgovernance.co.uk
Organisation: Shell Gas Direct
Representative: Lisa Harris
Date of Representation: 19th May 2011

Do you support or oppose implementation?

Supports

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

SGD recognises the current risks associated with a high proportion of unreconciled CSEP charges and therefore supports the use of the notional or agreed meter reading on CoS being used for reconciliation purposes.

We also support this modification as it brings the process for iGT sites more in line with established DN processes.

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

Due to the large number of CSEPs that have never been reconciled we do foresee that agreeing a meter reading between shippers may be more problematic than otherwise, potentially influenced by the fact it will ultimately generate a large charge.

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

yes

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

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We support the view that increasing the number of CSEP reconciliations, and therefore improving the accuracy of charges allocated to users, will minimise the amount of unidentified gas attributed to this cause and facilitate effective competition.

Impacts and Costs:

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

Minimal costs

Implementation:

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

1 month lead time. This modification will have minimal impact on our business processes so the lead time would just allow time to communicate the changes.

Legal Text:

Are you satisfied that the legal 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