

## Representation

### Draft Modification Report

#### **0369/0369A: Alternative Re-establishment of Supply Meter Points – measures to address shipperless sites**

**Consultation close out date:** 03 February 2012  
**Respond to:** enquiries@gasgovernance.co.uk  
**Organisation:** **EDF Energy Plc**  
**Representative:** Naomi D Anderson  
**Date of Representation:** 02 February 2012

#### **Do you support or oppose implementation?**

**0369** – Support

**0369A** - Not in Support

#### **If either 0369 or 0369A were to be implemented, which would be your preference?**

Prefer **0369**

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

EDF Energy understands there is a need to identify sites which consume gas and are currently classed as shipperless, therefore the cost of the gas is smeared across the Small Supply Point market in accordance to their market share. We would support the DNOs re-claiming transportation charges where sites have been incorrectly withdrawn. In such cases we believe that there is sufficient clarity to deduce the total transportation costs owed by the shipper. We believe this modification provides security of the effective competition between participants in the market.

EDF Energy believe that the additional clauses in 369A are too complex and address exceptions for a small minority of customers which would cause this derivation of the UNC to be unnecessary.

Additionally we feel that suppliers with sites which have customer owned meters should be incentivised to conduct regular site visits to protect the industry from theft.

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

EDF Energy believes that there is no process currently in place to deal with supply points that are registered by transporters on shippers behalf which provides added complexities to Mod 369A

## **The method of notification between the transporter, transporters agent and the shipper supplier of the site in question.**

### **Relevant Objectives:**

*How would implementation of either of these modifications impact the relevant objectives?*

We believe these modification impacts the following relevant objectives;

- Security of effective competition
- Promotion of efficiency in the implementation and administration of the Code.

### **Impacts and Costs:**

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

Depending on the detailed solution this modification may increase the number of Adhoc invoices for offline TRE adjustments and could require a new process to be set up. A new process for networks to notify shippers of sites which have been withdrawn from and are still consuming gas would need to be set up in order for the shippers to reconfirm these sites.

### **Implementation:**

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

We would suggest a six month implementation time to ensure that we have enough time to set up new processes and any system changes that might arise from changes to the invoicing process.

### **Legal Text:**

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

We are satisfied that the legal text is fit for purpose.

## **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.*