

As a relatively new and small energy supplier Spark Gas Shipping Limited would benefit from the proposals outlined in MOD 0380 for the following reasons:

1. Improved cash flow resulting from costs being charged on a more accurate estimate of demand. Costs would reflect to a greater extent the volume being invoiced to customers which is based on meter reads leading to matching of revenues and costs.
2. Follows the electricity industry in aiming for greater accuracy in the settlement of energy volumes.
3. Spark's unique position as a supplier to tenanted properties makes the company even more vulnerable to cash flow difficulties as a large proportion of our portfolio may be unoccupied at any point in time, leading to zero revenue while we are still liable for full costs based on AQ.
4. In addition to the advantages this would bring to Spark Gas Shipping we feel that the industry as a whole would benefit from these proposals as it would align costs with revenue leading to a cash flow situation which reflects customer demand more accurately. This would improve competition in the market as cash flow is a major consideration for smaller suppliers.

For these reasons Spark Gas Shipping agrees with the above proposal.

Best regards

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