

As a relatively new and small energy supplier Spark Gas Shipping Limited would benefit greatly from the proposals outlined in MODs 0382 and 0383 for the following reasons:

1. The cash flow implications of having a charge which remains at the same level throughout the year, regardless of demand, are significant to a small supplier as we are unable to match revenue with costs over the summer period.
2. As our customer base is 100% domestic the above is especially true.
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.
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 strongly with either of the above proposals but would have a preference for MOD 0382.

Best regards

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