

Representation

Draft Modification Report

0387: Removal of Anonymity from Annual Quantity Appeal and Amendment Reports

Consultation close out date: 06 January 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: **E.ON UK**
Representative: Brian Durber
Date of Representation: 06 January 2012

Do you support or oppose implementation?

Not in Support

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

A key principle within UNC reporting is anonymity. This is particularly important as the information contained within the various reports can easily be misconstrued and unless the full context is appreciated can lead to improper conclusions. Whilst it may be reasonable for large domestic suppliers to produce results that demonstrate the similar consumption behaviour of their customers the same cannot necessarily be said for others. For example I&C suppliers operating in a niche market where a particular market segment is generally increasing or decreasing its consumption compared to other segments, or where consumption reduction opportunity is greater than the norm. Comparison may well indicate inappropriate behaviour that is actually fully legitimate.

We are not against the principle of 'naming and shaming' but it must be based on a demonstrably level playing field otherwise it is not only misleading and therefore unhelpful but can be commercially damaging.

The Proposer states it is unfair that certain suppliers, e.g. British Gas are disadvantaged as they can easily be identified. Indeed we believe that it is not particularly difficult to identify any of the larger suppliers including ourselves. It is important to note that all of this information is available to Ofgem who can take action where they believe that misuse of the process exists. We do not see how any external observer could better make an objective assessment.

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

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Impacts and Costs:

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

Implementation:

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

Legal Text:

Are you satisfied that the legal text will deliver the intent of the 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.