

Further Consultation Representation

Final Modification Reports

0395 0398: Limitation on Retrospective Invoicing and Invoice Correction

Consultation close out date: 10 July 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: British Gas

Representative: Andrew Margan

Date of Representation: 10th July 2012

*Please provide comments on the revised Final Modification Reports available at:
www.gasgovernance.co.uk/03950398*

Do you support or oppose implementation?

0395 Support

0398 Support

Please make clear any differences you perceive between 0395 and 0398.

The perceived difference between 0395 & 0398 is timescales. Notwithstanding this Shippers are exposed to retrospective invoicing for corrections in the settlement window. This ongoing exposure creates risk for Shippers which in turn creates cost. The proposals should reduce Shipper's risk and customer's exposure to retrospective industry costs.

Whilst we recognise energy can remain unreconciled within the industry we believe the shorter timescales, 2-3 years and 3-4 years could have a positive impact on industry behavior incentivising Shippers to submit meter reads in a timely manner and thus ensure sites are reconciled appropriately.

British Gas considers the implementation of proposal 0398 an interim step to implementing proposal 0395.

Do you have any comments or issues you wish to record against the additional Workgroup considerations?

British Gas' position to Modification 0395/0398 remains the same. This can be found at the below address.

<http://www.gasgovernance.co.uk/sites/default/files/Representation%20-%20British%20Gas%200395.pdf>

Do you have any further information that can be provided in response to Ofgem's questions?

Please refer to Section 12 of Final Modification Report

There is no further information British Gas has to provide regarding Ofgem's request for further information.

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.

British Gas has responded to the 0395/0398 consultation and the request for information. British Gas currently has no further comment or information.

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

British Gas has not identified any additional issues.