

## Representation

### Draft Modification Report

#### 0396: EU Third Package: Three week switching

**Consultation close out date:** 02 March 2012

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** Scotland & Southern Gas Networks

**Representative:** David Mitchell

**Date of Representation:** 02 March 2012

#### Do you support or oppose implementation?

Qualified Support

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

SGN supports this modification as it allows the UK gas industry to become compliant with current EU legislation regarding change of supplier timescales for consumers. We believe that this modification will make it easier for consumers to switch suppliers which in turn will be good for competition. SGN wish to offer qualified support as although we support the modification we do not support the suggested cost allocations within the modification.

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

No

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

We believe that this Modification supports relevant objective d) as it will promote competition between shippers/suppliers.

#### Impacts and Costs:

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

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SGN opposes the view stated in the modification that the development costs associated with this mod should be borne by Network owners, we believe that costs associated with this change should be borne by shippers as they are the party who can benefit from the change. We also agree with Ofgem's view that this cannot be seen as a transportation related cost and so does not warrant a change to transportation charges.

**Implementation:**

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

None

**Legal Text:**

*Are you satisfied that the legal text and the proposed ACS (see [www.gasgovernance.co.uk/proposedACS](http://www.gasgovernance.co.uk/proposedACS)) will deliver the intent of the modification?*

Yes

**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.*

Although SGN supports this modification we believe that Modification 403 better facilitates the relevant industry objectives as there is less impact on IT systems and hence will be easier to implement.