

Representation

Draft Modification Report

0396: EU Third Package: Three week switching

0403: EU Third Package – 21 day switching with flexible objection period

Consultation close out date: 02 March 2012

Respond to: enquiries@gasgovernance.co.uk

Organisation: **Wales & West Utilities**

Representative: Robert Cameron-Higgs

Date of Representation: 02 March 2012

Do you support or oppose implementation?

0396 – Support

0403 – Support

Preference for 0396

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

Both proposals facilitate the required changes to the timeframes set out in Article 3(6a) of the Gas Directive which require Member states to ensure that where a customer wishes to change Supplier, the change is effected within three weeks.

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

The funding of either proposal would be more appropriately served if either solution was deemed User Pays.

0396

Representation

02 March 2012

Version 1.0

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Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Both proposals satisfy UNC relevant objectives (g); compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the agency for the Co-operation of Energy Regulators.

Impacts and Costs:

Xoserve have provided indicative costs for both proposals. As already mentioned the ongoing funding of this issue does warrant further consideration and consideration should be given to making either proposal a User Pays service.

Implementation:

Consistent with the timescales indicated by Xoserve, a 12 month lead time for implementation is considered appropriate.

Legal Text:

Are you satisfied that the legal text and the proposed ACS (see 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.

We believe consideration should be given to making either proposal a User Pays service.