

Representation

Draft Modification Report

0410 and 0410A: Responsibility for gas off-taken at Unregistered Sites following New Network Connections

Consultation close out date: 07 June 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: DONG Energy
Representative: Lorna Lewin
Date of Representation: 7th June 2013

Do you support or oppose implementation?

0410 - Support
0410A - Comments

If either 0410 or 0410A were to be implemented, which would be your preference?

0410

If either 0410 or 0410A or both were to be implemented, which would be your preference?

Prefer both **0410** and **0410A**

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

Support for modification 0410 is appropriate as it seeks to resolve unregistered sites by requiring a better process at the early stage of MPRN creation. Shippers in conjunction with suppliers who either individually or together have instigated a new connection will be incentivised to ensure the user confirms a new MPRN created by them in a timely manner.

0410A provides a defined process to register unregistered sites. However, there are gaps in the process that does not sufficiently deal with sites where no supply contract exists, therefore further development to address this is required.

Modification Panel Members have indicated that it would be particularly helpful if the following question could be addressed in responses:

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Version 1.0

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Q1: Do you believe that both Modifications could be implemented, such that both the 0410 and 0410A requirements are introduced to the UNC?

Both these modification could be implemented as they deal with different aspects of the unregistered process that leads to resolution of MPRN's not being registered and the appropriate recovery of energy charges.

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

Yes these have been recorded above as amendments to 0410A.

Relevant Objectives:

How would implementation of either of these modifications impact the relevant objectives?

These modification will reduce the number of un-registered sites and will apportion costs appropriately achieving Relevant Objective d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers.

Impacts and Costs:

What analysis, development and ongoing costs would you face if either of these modifications were implemented?

Both 410 & 410A would have little impact to our processes.

Implementation:

What lead-time would you wish to see prior to either of these modifications being implemented, and why?

The implementation of these modifications should allow some industry parties enough time to adjust their processes and contracts. Therefore we support the proposed implementation date of the 1st April 2014 for both modifications.

Legal Text:

Are you satisfied that the legal text and the proposed ACS (see www.gasgovernance.co.uk/proposedACS) will deliver the intent of these modifications?

Legal text has not been reviewed

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that you believe should be taken into account or that you wish to emphasise.

No further comment.