

Representation

Draft Modification Report

0421: Provision for an AQ Review Audit (previously 0379A)

Consultation close out date: 10 December 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: EDF Energy Plc
Representative: Naomi Anderson
Date of Representation: 10th December 2012

Do you support or oppose implementation?

Not in Support

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

Whilst EDF Energy agree with the intentions of the modification to encourage shippers to submit frequent and accurate meter readings we do not believe this modification is the best way to achieve the desired ambition. EDF Energy would support the concept of a Performance Assurance Board currently operating in the Power market to provide a more holistic set of audit points which are monitored and used to incentivise industry players. We support the intention of the modification to focus more on ensuring sites are read more frequently and to focus less on the AQ appeals process.

The reporting outcome differs significantly dependant on the parameters and could unfairly penalise shipper's dependant on the construction of the report and their portfolio.

We feel that the development costs could be better spent elsewhere and do not represent value for money which will have to be passed onto customers.

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

We are concerned that we don't believe this resolves the underlying reason for less LSP AQs recalculating. The recent economic climate has not helped access rates at business sites with a number of businesses folding and premises remaining empty with long term inability to gain meter reads.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We are not sure the modification incentivises shippers more than the current regime in place to ensure that meter readings are sent in a frequent and timely manner to Xoserve to be utilised in the AQ calculation.

Impacts and Costs:

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

This modification would not change EDF Energy's existing processes as we endeavour to focus on ensuring accurate data is kept. Parties are open to additional risk from incentive charges as well as the initial cost to implement.

Implementation:

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

EDF Energy does not support the implementation of this modification.

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.

No