

Representation

Draft Modification Report

0425: Re-establishment of Supply Meter Points – Shipperless sites

Consultation close out date: 15 April 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: EDF Energy
Representative: Naomi Anderson
Date of Representation: 15 April 2013

Do you support or oppose implementation?

Not in Support

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

EDF Energy is concerned that the complexity of Modification 425 makes it very difficult to accurately resolve each shipperless site. We are concerned that in many cases the incorrect shipper will be re-registered to a site where they have no recent involvement. Where a shipper has withdrawn from a site because there is no meter on site and gas is not flowing at the property we believe it is unreasonable to charge the shipper if they have not had any involvement with the reconnection. During the three month investigatory process if other parties are not forthcoming with information and do not complete registration it is likely that the incorrect shipper will be re-registered to the site.

EDF Energy believes that the Gas Transporters are in the best place to identify and resolve shipperless sites where it is outside of the control of one shipper. We would support an incentive regime which would encourage a Transporter lead solution.

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

EDF Energy are concerned that where a company ceases to operate in the market or has changed the services it offers, it will pick up consumers whom

- (a) it cannot offer a supply contract to; and/or
- (b) it cannot recover debts from as it does not have a contractual relationship with these consumers

Relevant Objectives:

We do not believe it has a positive impact on the relevant objectives because of the concerns we have around the incorrect suppliers being registered and the difficulty with correctly identifying when meters were installed.

Impacts and Costs:

There will be system change required to allow us to accept unsolicited notifications from Transporters.

Implementation:

EDF Energy does not support the implementation of this modification.

Legal Text:

No comments

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

No comments