

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: RWE npower
Representative: Richard Vernon
Date of Representation: 15th April 2013

Do you support or oppose implementation?

Not in Support

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

We supported the intent of modification 424 which sought to put correct liability onto Suppliers where Supplier processes have failed, resulting in increased numbers of Shipperless sites, impacting other Suppliers and Customer costs. Modification 425 seeks to go further than this to put liability for scenarios onto Suppliers over which there is little or no control. Further, there is some question as to whether the Supply contract in place would extend to any new occupants of a premises within some scenarios of 425.

Modification 425 has the potential to legitimise both illegal abstraction and the incomplete processes of some industry parties. This is not the best way to address the issue of what is essentially erroneous meter installation (by parties and non parties). Current industry controls over when a gas meter can be installed are not sufficiently governed; this in itself creates a barrier when seeking to confirm liability. We would consider supporting this modification if stronger controls were added to the OAMI and MAMCoP to ensure that meters installation is firstly only carried out at the request of the registered supplier and secondly, is fully auditable.

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?

It would not.

Impacts and Costs:

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

Minimal: Training and process development.

Implementation:

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

6-9 months for development work.

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