

## 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:** Scotland Gas Networks : Southern Gas Networks

**Representative:** David Mitchell

**Date of Representation:** 15 April 2013

#### Do you support or oppose implementation?

Support

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

SGN believe that this UNC Modification will have a positive effect on reducing the population of Shipperless sites, as it will introduce obligations on the last registered Shipper to resolve the issue. We believe that this Modification over time will reduce the number of new instances of Shipperless sites as it will drive improved behaviour by Shippers when withdrawing from Supply Points as they will seek to avoid unnecessary cost that they may incur from an incorrect withdrawal process being followed.

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

During discussions with Xoserve regarding auto registration of sites an issue was raised regarding the need to provide an additional number of data items which would allow the Modification process to work successfully. We believe that this is an issue which needs to be taken into account by the proposer of the Modification to ensure that the legal text associated with the proposal reflects these required data items.

#### Relevant Objectives:

SGN believe that this Modification impacts on relevant objective d(i) & d(ii) we feel that the implementation of this modification will promote better cost targeting on system users which would otherwise be attributed to the Rbd process.

#### Impacts and Costs:

The implementation of this modification will impact on Xoserve as it's an additional process that Xoserve will have to manage in future. This process carries a number of new monitoring processes and exchanges of data between a number of parties.

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**Implementation:**

SGN agrees with the proposers implementation timescales.

**Legal Text:**

We are satisfied that the legal text meets the criteria of the modification.

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

Although SGN supports this Modification we believe that the modification doesn't address the route cause of a site becoming Shipperless in the first instance. We believe that there is the potential to improve the site withdrawal process in the future to make it more robust.