

## 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:** Total Gas & Power  
**Representative:** Andrew Green  
**Date of Representation:** 12 April 2013

#### Do you support or oppose implementation?

Not in Support

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

If a Supplier disconnects a meter and physically removes that meter from site to prevent that meter from being reconnected and then withdraws, the supplier then has no relationship with that customer or control over what may happen in future at that site. We have a competitive metering market and as such, customers can, and often do make their own metering arrangements and are able to procure the installation of a new meter without any involvement from a supplier. If an end consumer does install a different meter following disconnection and removal of the old meter, this activity is completely outside the control of the old supplier following the end of their relationship with that consumer and any gas consumed should not be their responsibility. It would be unfair to force the previous supplier back into a deemed contractual arrangement with an old customer (especially where the customer was disconnected for debt) when the Supplier has acted in good faith and done everything within their powers to prevent future consumption of gas at that site by removing the old meter. The only other option open to suppliers if this modification were to be implemented would be to remove the service altogether – at great expense to end consumers and a disproportionate measure. Networks should introduce controls to prevent the connection of meters to their networks without a registered shipper and supply contract being in place.

#### 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?*

TGP does not believe this proposal furthers any of the relevant objectives

0425

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15 April 2013

Version 1.0

Page 1 of 2

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**Impacts and Costs:**

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

**Implementation:**

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

**Legal Text:**

*Are you satisfied that the legal text [and the proposed ACS (see [www.gasgovernance.co.uk/proposedACS](http://www.gasgovernance.co.uk/proposedACS))] will deliver the intent of the modification?*

**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.*