

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: WINGAS UK Ltd
Representative: Rob Johnson
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.

While WINGAS UK recognises the need for appropriate action to reduce the consumption of unregistered gas, however implementation of this modification would expose WINGAS UK to unacceptable risks when legitimately withdrawing from sites where we have arranged for isolation of the supply should any other agent subsequently install an asset to the capped off supply point without following the proper registration procedures.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Our primary concern with this modification regards the risk that shippers will be exposed to that may occur where the meter may be reconnected without the supplier's knowledge and the supplier may be in a position where they would be liable for the gas consumed and other associated costs due the actions of other parties. In situations such as these there would be no contractual rights to recover debt from the consumer.

We feel that more appropriate measures could be introduced, for instance mechanisms to allow the networks to prevent the connection of meters without a supply contract with a registered shipper.

Impacts and Costs:

What analysis, development and on-going costs would you face if this modification were implemented?

Should this modification be implemented, a shipper would be much more likely to remove a service as well as a meter before withdrawing from a site to prevent exposure to the risks highlighted above. These additional works would be cause a significant level of inconvenience and extra cost to the customer

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21 March 2013

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(especially in properties owned by a landlord not willing to enter into a supply contract while his property is vacant).