

## 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:** Winchester Gas  
**Representative:** Huw Comerford  
**Date of Representation:** 11 April 2013

#### Do you support or oppose implementation?

Support

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

The amount of unallocated gas represents a significant portion of a shipper's allocation in the SSP market and as such any process that would improve this situation is one which we would want.

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

We are concerned over situations that may occur where the meter may be re-connected without the supplier's knowledge and the supplier may be in a position where they are responsible for the gas consumed at site but may no longer have contract with the consumer and therefore have no contractual rights to recover this debt from the consumer.

#### Relevant Objectives:

*How would implementation of this modification impact the relevant objectives?*

#### 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?

0425  
Representation  
21 March 2013

Version 1.0

Page 1 of 2

© 2013 all rights reserved

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*

0425

Representation

---

21 March 2013

---

Version 1.0

---

Page 2 of 2

---

© 2013 all rights reserved