

Representation

Draft Modification Report

0429: Customer Settlement Error Claims Process

Consultation close out date: 07 June 2013
Respond to: enquiries@gasgovernance.co.uk
Organisation: SSE
Representative: Mark Jones
Date of Representation: 07 June 2013

Do you support or oppose implementation?

Not in Support

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

SSE does not support implementation of this modification as it increases uncertainty within gas settlements and risks can be passed on to parties by others not acting in a proper and correct manner. Implementation of this modification would reduce the incentive to identify errors in a timely manner. A large amount of risk and uncertainty would be borne by the SSP sector, which is not an equitable position and as the proposal is to smear claims to other shippers based on the balancing neutrality process, shippers could pick up costs based on a market share that was very different to their market share at the time the error occurred.

Within the gas industry we should be working to a position where the gas settlement period is reduced further from the 3 to 4 year reconciliation period due to be implemented from next April and this modification goes against this aim.

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?

We do not believe that it would impact positively on any of the relevant objectives.

Impacts and Costs:

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

None.

Implementation:

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Version 1.0

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

The modification could be implemented in line with the timings specified in the modification itself.

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.