

## Representation

### Draft Modification Report

#### 0429: Customer Settlement Error Claims Process

**Consultation close out date:** 07 June 2013

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** Scotland & Southern Gas Networks

**Representative:** David Mitchell

**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.

SGN is sympathetic to the principle of this UNC Modification, however we feel that the Transporter would become unduly responsible for settling the shipper error claims process based upon data submitted by Shippers. The Modification specifies a requirement to submit evidence in support of a Shipper's claim but does not give specific details of the nature of this evidence or what it must contain. We believe that a more in depth framework needs to be developed which would detail the level of evidence required to justify a valid a claim. The Modification does not allow the Transporters to carry out an audit of how the Shipper's analysis was collated, this in itself could undermine the process. While the Modification allows the Transporters to claim reasonable costs from the Shipper for processing a claim, it does not allow for costs to be recovered if the determination by the Transporters is disputed by the Shipper. In such instances the disputes resolution process may be utilised which would no doubt be a long and costly process to both parties involved.

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

N/A

#### Relevant Objectives:

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

SGN is unsure how relevant objective D would be met in the event that a claim is disputed by several parties furthermore we are concerned that this Modification does not incentivise parties to resolve errors in a timely manor.

#### Impacts and Costs:

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

0429

Representation

07 June 2013

Version 1.0

Page 1 of 2

© 2013 all rights reserved

While we believe that the initial costs of implementing this Modification would be met we are unsure what the ongoing cost of this modification would be or how these costs would be met.

**Implementation:**

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

We agree with the proposer's implementation lead times.

**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?*

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