

Representation

Draft Modification Report

0429: Customer Settlement Error Claims Process

Consultation close out date: 07 June 2013

Respond to: enquiries@gasgovernance.co.uk

Organisation: ScottishPower Energy Management Ltd

Representative: Marie Clark

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.

ScottishPower do not support this Modification as we believe that if this proposal was to be implemented this would introduce additional risk and uncertainty to the SSP market sector. As any adjustment made to settlement volumes as a result of this regime would be applied through the current RbD settlement mechanism, SSP Shippers/Suppliers and ultimately their customers would bear the risk of any adjustment. In addition we are concerned at the lack of verification or audit process to ensure that a balanced approach to settlement claims/adjustments is operated. We believe that Shippers require to be incentivised to correct any data issues at the earliest possible opportunity either through timely adjustment to settlement volumes or via contract terms. We understand that on occasions delays can occur in the identification of issues relating to meter standing data; however we believe that Suppliers and Customers require to make adequate provisions within their commercial metering contracts to back off any potential liabilities that may arise.

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

None

We do not believe that there are any new or additional issues that should be recorded.

None

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

Standard Special condition A11.1 (d) Securing of effective competition.

We believe that implementation of this Modification would adversely impact competition between Shippers and their suppliers as it would introduce additional risk and uncertainty to the gas settlements regime.

Impacts and Costs:

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

None

Implementation:

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

No issues identified.

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.