

Representation

Draft Modification Report

0512S - Amendment to Section M to be consistent with Faster Switching proposals

Consultation close out date: 23 January 2015
Respond to: enquiries@gasgovernance.co.uk
Organisation: E.ON
Representative: Colette Baldwin
Date of Representation: 09 January 2015

Do you support or oppose implementation?

Support

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

The code needs to be updated to reflect that the meter asset information should not be sent to the incoming shipper until the transfer has passed the “point of no-return”, therefore the date needs to be aligned to the changes for confirmation timescales.

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

While we support the solution, we disagree with the setting of an arbitrary performance target that metering information will be sent in 90% of instances at SSD -2 (measured over a year), and 100% by D. There is little point in setting at target without consequences for failing to meet it. The purpose of a performance target is to incentivise good performance. Given that in the year Oct '13 – Sept '14 of the 21,714,664 live supply points only 13% went through a confirmation process (2,764,669), not all of which relate to a change of supplier event¹, a 90% target cannot be determined as incentivising good performance, and in fact a large amount of failure could be seen month on month but not impacting the overall annual target. If a target is to be set, it should be a meaningful target that ensures that the Transporters provide the information within timescales that facilitate other dependent processes – such as the Opening Read requirements, and not meeting the target should be an exceptional event – such as during times of updating the outputs of the AQ Review when system constraints impact the Transporter Agency’s ability to meet it.

Self Governance Statement:

Yes

¹ as per information provided to PAF [Independent Study](#) partners by Xoserve, and presented in the Dynamic Model

Relevant Objectives:

By making the legal text relating to meter asset provision on a change of supply consistent with timescales relative to the CoS process elsewhere within the code, this remedies an inconsistency within the code which therefore facilitates Relevant Objective F.

Impacts and Costs:

None – as this is a text correction only.

Implementation:

It is important that this is implemented immediately upon completion of the modification process.

Legal Text:

I think the legal text is made problematic by the inclusion of the arbitrary target of 90%, and given that there is no consequence for failure to meet the target I'm unsure of the rationale for its inclusion in the legal text.

Is there anything further you wish to be taken into account?

No