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GB ECM-05 For the modification to the Use of System charging methodology to cater for manifest data errors in the calculation of TNUoS tariffs

Dear Craig,

Thank you for the opportunity to comment on the above pre-consultation. It is appropriate that a mechanism should exist for dealing with manifest errors. However, it should be noted that Users require certainty and that Users' contractual positions are likely to reflect the published TNUoS rates. So, any later increase in TNUoS may effectively be a penalty on the User.

Clearly, it is preferable that any errors are corrected before tariffs are finalised. So to encourage this we would suggest that indicative tariffs are published as early as possible, complete with any necessary supporting data. It is noted that DNOs are broadly obliged to publish indicative tariffs at the same time as giving notice of their intention to change prices.

The suggestion of a material effect being £1/kW on the TNUoS rate seems reasonable, as does limiting eligibility to the relevant charging year. Where the error is outside of NGET's control it is agreed that within-year reconciliation is not appropriate. It may be worth considering using the under/over recovery mechanism to recover revenue that is paid to a User that has been over-charged following a manifest error. This would give the least disturbance for the relevant charging year. In the unlikely event of an error that NGET could reasonably have been expected to identify, NGET should be expected to bear the costs of reimbursing any over-charged users.

If you would like to discuss any aspect of our response, please do not hesitate to contact me.

Yours sincerely

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