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From: Alison.Meldrum@corusgroup.com [<mailto:Alison.Meldrum@corusgroup.com>]

Sent: 27 May 2005 16:54

To: Samanta Padalino

Cc: Stephen.Macey@corusgroup.com

Subject: Transco's Distribution Charges

We note Ofgem's open letter referencing changes to distribution charge from

1 October 2005. Our response is very brief owing to time constraints. Whilst this may appear as a non-sequitur to your letter, we have taken this opportunity to lodge our frustration that basic concerns relating to distribution charging have still not been satisfactorily addressed.

I highlight Ofgem's consultation 101/04 "Review of Transco's structure of distribution charges" dated May 2004 which invited comments on a number of charging issues including cost reflectivity and customer charging. It is unreasonable to leave the obvious recommendations from this document unanswered or unpublished more than 1 year from the date of the initial document. The cost reflective theme addressed in this consultative document will now be fundamental to the impending DN interruption reform.

Furthermore, reform to charging structures would have been preferable before DN sales; now that full consent has been granted for the sales, we anticipate attempts will be made to introduce diverged charging methodologies. We ask for our prevailing concerns to be acknowledged in a common structure before any such initiatives are considered.

I reattach our submission to the referenced document.

Regards

Alison Meldrum

Corus Energy Supplies

----- Forwarded by Alison Meldrum/UK/Corus on 27/05/2005

09/06/2005

14:59 -----

To: frances.warburton@ofgem.gov.uk  
cc: (bcc: Alison Meldrum)  
Subject: Review of Transco's Distribution Charges

Dear Frances,

Corus' comments on your review of Transco's distribution charges are as follows:-

#### 1. Cost Reflectivity.

We support the principle of cost reflective charges, provided undue complexity and significant transaction costs are not created. For example, charging every individual consumer a site specific charge depending on location would not be sensible. The present postalised system is a reasonable compromise. There are, however, two areas where changes should be made to improve cost reflectivity - capacity/commodity split and customer charges.

#### 2. Capacity/commodity Split.

We have long argued that the present split of 50/50 is not cost reflective and therefore Transco is in continuing breach of its licence. Gas distribution is a high fixed cost operation and, unlike the NTS, has no compressors. The split should therefore have a higher capacity weighting than the NTS and we believe it should be 99/1. The current split is economically inefficient and results in cross subsidies in favour of low load factor users and of firm users at the expense of interruptible users. In this context we entirely reject Ofgem's long-held suspicion that firm users are subsidising interruptibles. No evidence or coherent argument has been advanced for this. On the contrary, interruptibles enable firm users to continue to receive supply during times of system stress. The discount for interruptible is effectively an insurance premium payable by Transco. Just because the extent of actual interruption may have been low in the past does not negate the benefit to Transco of having the option to interrupt.

If there are concerns about the impact on lower load factor users by moving to 99/1, such a move could be phased in over 2/3 years.

#### 3. Customer Charges

It appears to us that this is another area where large users are subsidising smaller ones. It covers emergency work and service pipes

- which will probably have been paid for anyway by premises connecting to the system. We have two large steelworks in S. Wales, which each currently pay a customer charge of £45,000 pa. This is hardly cost reflective and we believe that Ofgem should challenge Transco to demonstrate that its charging functions are cost reflective, particularly for larger sites. We note that a customer charge forms no part of the charging methodology for NTS connectees.

#### 4. Connection Charging Boundary

On balance we believe the present "shallowish" policy is about right. However, given

Ofgem's stated intention of existing interruptible customers becoming firm at some future date, it would entirely unreasonable to ask those customers moving to a firm supply to pay for any reinforcement of the system.

#### 5.Economic Test

Based on our past experience, Transco's economic test is not transparent to the customer. We do not know if Transco now shares full details of its economic test with users requesting reinforcement. If not, this should be rectified.

The asymmetry highlighted in the consultation document certainly merits further consideration if the sums involved are material. If not, there many other areas - high wholesale gas prices for example - that Ofgem could focus resources on.

#### 6.CSEPS

Any different charging for a CSEP should only reflect any differential costs imposed on Transco compared with a similar sized customer connected to Transco's distribution system, otherwise another cross-subsidy would be created.

#### 7.Implications for Price Control/DN Sales

The economically inefficient aspects of Transco's charging structure, notably the 50/50 capacity / commodity split, have persisted for too long and should have been corrected ages ago. As the main effect has been cross-subsidies between users, removing these should given priority. There should not be a material impact on Transco's price control, although moving to a capacity based system would improve predictability of revenue.

As for DN sales, it would benefit users, suppliers and shippers to have consistent charging methodologies across Transco DNs and DNs under new ownership. Changes to Transco's methodology should therefore be made forthwith or else Ofgem's task may become more difficult with other DN owners to deal with in addition to Transco.

I hope you find our comments helpful and that you will be minded to act on our proposals for change, which is long overdue.

Please acknowledge receipt of this message.

Your sincerely, Stephen Macey.

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