.box.NGM.pricingconsultation

From: Worrall, Mark [Mark.A.Worrall@eonenergy.com]

Sent: 01 November 2012 19:07

To: .box.NGM.pricingconsultation

Cc: Travell, Alex; Mantle, Naomi; Hodgetts, David; Newton, Tim; Thompson, James

Subject: E.ON additinal submission to pricing consultation

Following the consultation workshops in October, I would like to submit the additional questions and preference below for consideration in the review.

Questions

- Would the IGTs would be allowed/interested in the asset transfer arrangements, they have historically had the same licence conditions to provide gas metering services so could argue that they should be included. We know that they are particularly concerned by the stranded asset risks to their businesses so an outcome where they transfer their non-smart meters to NGM NMM service therefore may be in everyone's interest?
- Are illegal meters built into the portfolio cost? What is the anticipated RAV impact?
- E.ON anticipate a surplus of traditional metering, would NGM be interested in procuring these?
- An older meter requiring a data logger will need to be exchanged as there won't be a pulsed output, what consideration has been given to the transfer of liability and the impact for RAV? As this work will sit with NGM this assumption will need building in.

Preference

Our preference is that the RAV allocation is calculated using method 2.

2. A pro rata allocation of the 2012 metering RAV based on the current depreciated replacement cost values of the domestic and I&C meters.

This methodology is the most fair and equitable and offers the purest calculation. We consider the analysis could be completed in a reasonable time using an external consultant.

Regards,
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