

Comments on Bord Gais Networks Proposed Siteworks Charges
Reference CER/08/127 dated 18th July, 2008

Supplier Requested Activities

Domestic Meter Lock

The proposed charges are as follows;

	<u>Proposed (net VAT)</u>	<u>Current (net VAT)</u>	<u>% Increase</u>
Normal Hours	63.88	46.00	38.9%
Outside Normal Hours	95.82	46.00	108.3%

The proposed increases are astronomical and domestic customers certainly would not be able to bear the proposed level of cost increases. This is especially so given the significant recent increase in gas prices.

We are very much against having a two tiered pricing structure (normal hours and outside of normal hours). This will result in a high level of customer complaints and dissatisfaction. Furthermore, it would be administratively cumbersome for Shippers and increase administration overheads. There should be a single charge.

Supply Restoration

	<u>Proposed (net VAT)</u>	<u>Current (net VAT)</u>	<u>% Increase</u>
Normal Hours	63.88	56.00	14.07%
Outside Normal Hours	95.82	56.00	71.11%

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Once again the proposed level of increases is unsustainably high. The majority of customers affected by these charges are already struggling to pay their gas bills.

We strongly oppose the concept of the two tiered pricing structure. It is much more advantageous to have a single charge.

Domestic Locking/Unlocking Charging Policy

A relatively large number of people struggle to pay their gas bills. Under the current BGN proposals, they will end up being billed for between €145.00 (incl. VAT) and €217.51 (incl. VAT) where their meter is locked and then unlocked. These customers simply cannot afford to pay the proposed level of charges.

CER Policy should be to keep these charges to a minimum to protect underprivileged and vulnerable customers.

We recommend that lock/unlock charges should not be increased and should instead be reduced. Any under-recovery in BGN costs should be recovered by way of higher Transportation charges. This spreads the cost across the entire domestic customer base.

Unsuccessful Meter Lock Requests

BGN are currently charging for Meter Locks where they have failed to carry out the lock. This is unacceptable. Shippers should only be expected to pay where they actually receive a service i.e. the meter is locked. If BGN effectively charge for all calls (meter locked or not locked), then they have no incentive to be efficient.