

Representation - Draft Modification Report UNC 0857

Revision to the Determination of Non-Transmission Services Gas Year Target Revenue

Responses invited by: **5pm on 26 January 2024**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Richard Fairholme
Organisation:	Uniper
Date of Representation:	26/01/2024
Support or oppose implementation?	Support
Relevant Objective:	d) Positive
Relevant Charging Methodology Objective:	c) Positive

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

We support this proposal, which is helping to address a well known problem, which is the lack of alignment between the gas charging year and financial / price control year. The resultant volatile prices has significant impacts for Shippers, who have to manage this risk. We expect that implementation of this proposal will reduce the volatility and lead to more stable and predictable Non-Transmission Services charges for Shippers and ultimately, customers.

Implementation: What lead-time do you wish to see prior to implementation and why?

As soon as reasonably practicable

Impacts and Costs: What analysis, development and ongoing costs would you face?

None expected

Legal Text: Are you satisfied that the legal text will deliver the intent of the Solution?

Yes

Modification Panel Members have requested that the following questions are addressed:

Q1: Can you comment on the distributional consumer impacts of the Modification?

This analysis is for the proposer to undertake.

Q1: Do you think there are any license issues associated with this Modification?

It is for National Gas to satisfy itself and Ofgem that it is compliant with its licence obligations.

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

No.

Please provide below any additional analysis or information to support your representation

Nothing to add.