

Representation - Draft Modification Report UNC 0730

COVID-19 Capacity Retention Process

Responses invited by: 5pm on 05 November 2020

To: enquiries@gasgovernance.co.uk

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

Representative:	Gareth Evans
Organisation:	ICoSS
Date of Representation:	5 November 2020
Support or oppose implementation?	Support
Relevant Objective:	a) Positive d) Positive
Charging Relevant Objective:	c) Positive

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

We agree with the proposer that this modification furthers the following relevant objectives:

- a) This modification, by providing relief to those customers who have ceased operation as a result of the COVID-19 pandemic should help avoid their permanent disconnection from the network and so prevent demand destruction. As was highlighted in Ofgem's decision for UNC Modification 0275, maintaining continued demand from large gas customers will prevent underutilisation of the network and so promote its economic and efficient operation.
- d) Improving the cost-reflectivity of the charges incurred by sites that have been isolated under the provisions of UNC Modification 0723 will further competition between shippers. This also applies for charging relevant objective (c).

We anticipate that the need for such relief will increase as the COVID-19 Pandemic progresses, as since this modification has been raised, we have witnessed more sites having their operations suspended through local lockdowns.

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

To ensure that the maximum number of customers receives the benefits of the proposal as soon as possible, this modification should be implemented as soon as possible.

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

The costs to members in managing this proposal will be minimal and be limited to managing refunds or reductions in customer costs.

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

We believe that the legal text delivers the intent of the proposal.

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

N/A