

Representation - Draft Modification Report UNC 0840 (Urgent) Equalisation of prepayment and non-prepayment AUG factors

Responses invited by: **5pm on 13 March 2023**

To: enquiries@gasgovernance.co.uk

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

Representative:	Daniel Wilkinson
Organisation:	EDF Energy
Date of Representation:	13 th March 2023
Support or oppose implementation?	Support
Relevant Objective:	d) None

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

We support the equalising of the AUG weighting factors across prepayment and non-prepayments EUC's in the same sector and product class. This reduces the penalty on pre-payment users and spreads the apportionment between both metering types. We do however appreciate the independent nature of the AUG.

We do believe equalising of factors would flow through to customer bills through the SVT cap, based on historic data this would reduce the prepayment cap and increase slightly the non-prepayment cap, reducing the penalty for prepayment users.

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

Oct'23 or Oct'24

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

Based on recent historic weightings this would reduce cost for prepayment users and increase cost for non-prepayment users based on suppliers passing this cost through to the respective users.

Implementation costs likely insignificant.

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

N/A

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.*

N/A

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

N/A