

Representation - Draft Modification Report UNC 0865S

Permitting DNOs to charge Shippers negative Supplier of Last Resort (SoLR) unit rates

Responses invited by: **5pm on 09 January 2024**

To: enquiries@gasgovernance.co.uk

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

Representative:	Mark Jones
Organisation:	SSE Energy Supply Limited
Date of Representation:	05 January 2024
Support or oppose implementation?	Support
Relevant Objective:	c) Positive d) Positive
Relevant Charging Methodology Objective:	c) Positive

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

When Ofgem introduced a multi-stage process for claims by SoLRs in 2021, it comprised of an initial claim, a subsequent claim (if any) and a truing up process. The truing up process could lead to negative SoLR customer charges and, therefore, the UNC needs to provide for these negative charges. Without this change DNOs would not be permitted to make payments to Shippers to refund net negative SoLR claims.

Self-Governance Statement: Please provide your views on the self-governance statement.

We believe the modification meets the self-governance criteria.

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

The modification should be implemented as soon as possible in line with self-governance timescales.

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

We would incur some small development costs.

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. Consider unintended consequences of allowing positive and negative SOLR charges

No unintended consequences identified.

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 represent