

Representation - Draft Modification Report UNC 0665

Changes to Ratchet Regime

Responses invited by: **5pm on 14 March 2019**

To: enquiries@gasgovernance.co.uk

Representative:	Colin Prestwich
Organisation:	Smartest Energy
Date of Representation:	06/03/2019
Support or oppose implementation?	Support
Relevant Objective:	a) Positive d) Positive

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

Smartest Energy would like to express support for the modification UNC 0665 Changes to the Ratchet Regime. Current ratchet charges are non-cost reflective and are not proportionate for most customers, and we believe this has impacted on Product Class 2 take up. This lack of Product Class 2 utilisation has, we believe, directly impacted on Unidentified Gas (UIG) allocation and therefore the current Ratchet arrangements are not fit for purpose.

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

We agree with the proposed implementation time stated within the report of Winter 2019/2020.

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

No Comment.

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

No Comment.

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 Comment.

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

NA