

Representation - Draft Modification Report UNC 0825

Removal of the remaining Retrospective Asset, Address and Supply Point (RAASP) elements of the Retrospective Adjustment arrangements put in place under Modification 0434

Responses invited by: **5pm on 10 August 2023**

To: enquiries@gasgovernance.co.uk

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

Representative:	Tom Stuart
Organisation:	Wales & West Utilities
Date of Representation:	9.8.23
Support or oppose implementation?	Support
Relevant Objective:	f) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

It is clear modification 0651, which modification 0825 is amending, no longer delivers the anticipated benefits therefore WWU supports modification 0825. This is a result of improvements in data accuracy and monitoring made possible by the introduction of the new Retail Energy Code and the activities of the Performance Assurance Board. The avoided spend will benefit industry parties and will be passed onto consumers through reduced transportation charges.

We agree that this modification furthers Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code.

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

This modification should be implemented as soon as possible.

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

None

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

Yes

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.*

None

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

None