

Representation - Modification UNC 0788 (Urgent)

Minimising the market impacts of 'Supplier Undertaking' operation

Responses invited by: **5:15pm on 20 October 2021**

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:	20 October 2021
Support or oppose implementation?	Support
Relevant Objective:	a) Positive d) Positive
Relevant Charging Methodology Objective:	Not Applicable

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

This proposal is likely to reduce the potential impact of a shipper exiting the market in an uncontrolled fashion, removing shipping services from 3rd party suppliers. This will further the relevant objectives identified above./

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

As soon as possible to reduce the negative effects identified in this modification, which it is seeking to avoid.

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

We anticipate members will incur minimal costs if they are not eligible for this process. Members who may be using this process will be able to reduce their balancing costs by engaging directly with a shipper.

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

We have not had time to review the legal text

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.*

We do have concerns that the process, whilst intended to resolve an apparently short-term issue as which impacted suppliers arrange new shipping arrangements, does not have an apparent end date and so these suppliers can seem to operate under these arrangements indefinitely. This means these suppliers (and the associated shippers) can avoid resolving the issue if commercially or operationally convenient.

We believe that consideration should be given to a “sunset” clause for these arrangements to be retired from the UNC, or a defined period in which a supplier may utilise these arrangements to encourage that supplier to obtain a new shipper as soon as possible.

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

NA