

## Representation - Draft Modification Report UNC 0695S

### Obligations on Shippers to pass Transporter compensation payments on to consumers, via Suppliers

Responses invited by: **5pm on 10 October 2019**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Nigel Winnan
<b>Organisation:</b>	Wales & West Utilities
<b>Date of Representation:</b>	10 <sup>th</sup> October 2019
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	c) Positive f) Positive

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

WWU believes that Shippers currently pass on voluntary payments for end consumers made by Transporters together with statutory payments. WWU supports this modification as it codifies existing best practice in regard both to passing on voluntary payments and doing this in a timely manner and therefore furthers relevant objective (f). It also furthers relevant objective (c) as it enables Transporters to better discharge their licence obligations. It should be noted that Ofgem will be amending the statutory payments in RIIO GD2 from April 2021 and removing the caps on some payments. WWU are committing to paying more than the statutory payments in RIIO GD2.

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

We agree that this modification satisfies the self-governance criteria.

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

We support implementation 16 business days following a panel decision to implement subject to no appeal being raised.

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

There are no direct costs resulting from this change. DSC change XRN4896 has been raised separately to ensure that Xoserve systems can process the payments. WWU have responded to this change to ensure the Ofgem changes to payments, the removal

of caps and likelihood of GDNs making different payments are all considered and that this applies to all non-connections related GSoPs.

**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.*

No.

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

WWU currently makes limited use of this means of making customer service payments to customers as where possible we make payments directly to customers to ensure that they receive payments as soon as possible. Notwithstanding this, this modification together with SPAA CP 476, is sensible change.