

## Representation - Draft Modification Report UNC 0795S

### Arrangements for charging for revenue to pay valid Last Resort Supplier Payment claims

Responses invited by: **5pm on 11 January 2022**

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>	Dion Tickner
<b>Organisation:</b>	Octopus Energy
<b>Date of Representation:</b>	11/1/2022
<b>Support or oppose implementation?</b>	Oppose
<b>Relevant Objective:</b>	c) None f) None
<b>Relevant Charging Methodology Objective:</b>	Not Applicable

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

Whilst we are supportive of the intention to provide transparency to Last Resort Supply Payments we are concerned that the pace of this code modification does not allow time for unintended consequences to be fully debated and understood.

In concept this modification will allow suppliers to forecast charges more effectively, which is seemingly beneficial to the LRSP process. However, it opens the door to further debate around how the charges are applied fairly.

Further, suppliers have not had enough time to fully understand how this code mod works in conjunction with existing codes as well as code modifications live or in the pipeline.

Of biggest concern is that through multiple urgent code mods the industry creates a hasty solution that, although may be well intentioned, unfairly impacts consumers.

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

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

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

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

**Modification Panel Members have requested that the following questions are addressed:**

*Q1: The proposer's view is that if 0687V is directed for implementation that this modification should not be implemented. Do you agree with this view?*

**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.*

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