

Representation - Draft Modification Report UNC 0865S

Permitting DNOs to charge Shippers negative Supplier of Last Resort (SoLR) unit rates

Responses invited by: **5pm on 09 January 2024**

To: enquiries@gasgovernance.co.uk

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

Representative:	Claire Louise Roberts
Organisation:	ScottishPower
Date of Representation:	09 January 2024
Support or oppose implementation?	Support
Relevant Objective:	c) Positive d) Positive
Relevant Charging Methodology Objective:	c) Positive

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

ScottishPower supports implementation of this modification, as the changes introduced by UNC0797 did not allow for DNO's to issue payments to Shippers for negative SOLR charges. This modification acts as an enabler as it introduces a mechanism for payments to be made to Shippers for negative SOLR.

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

We believe the modification meets the self-governance criteria

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

Since Ofgem have published their decision that SoLR claims are to be net positive for 2024/25, there is less of a time critical dependency to have this implemented by May 2024.

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

We do not anticipate any additional impacts or cost as a result of this change.

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

Yes, we are satisfied that the legal text will deliver the intent of the solution.

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

Q1. Consider unintended consequences of allowing positive and negative SOLR charges

None identified.

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

No further comment